

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**FILED**

MAY - 4 2020

UNITED STATES OF AMERICA

v.

MARCIN CIBOROWSKI,  
also known as "Rafal Golaszewski," and  
MARIUSZ DANILUK,  
also known as "Karol"

CASE NUMBER:

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNDER SEAL

**20CR 216****CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. From in and around 2016 to in or around the present, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendants violated:

*Code Section*

Title 18, United States Code, Section 371

*Offense Description*

conspiracy to import, or attempt to import into the United States; hold or attempt to hold; and keep, maintain, control, support, employ, or harbor in any house or other place, aliens for the purpose of prostitution or for any other immoral purpose, in violation of Title 8, United States Code, Section 1328

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

*Oleg Sokolov*  
OLEG S. SOKOLOV  
Special Agent, Homeland Security Investigations (HSI) *with permission telephonically*

Pursuant to Fed. R. Crim. P. 4.1, this complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: May 4, 2020

*Robert M. Dow, Jr.*  
Judge's signature

City and state: Chicago, Illinois

ROBERT M. DOW., JR., U.S. District Judge  
Printed name and title

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, OLEG S. SOKOLOV, being duly sworn, state as follows:

1. I am a Special Agent with Homeland Security Investigations (“HSI”). I have been so employed since approximately October 2010. As part of my duties as an HSI Special Agent, I investigate criminal violations relating to narcotics trafficking, immigration, sex trafficking, and money laundering and other financial offenses. I have participated in and led numerous complex investigations into transnational criminal organizations. In so doing, I have served as the affiant on multiple federal search warrants.

2. This affidavit is submitted in support of a Criminal Complaint alleging that MARCIN CIBOROWSKI, also known as “Rafal Golaszewski,” and MARIUSZ DANILUK, also known as “Karol,” have violated Title 18, United States Code, Section 371, by conspiring to import aliens for purposes of prostitution, in violation of Title 8, United States Code, Section 1328.

3. The information in this Affidavit, including my descriptions and bracketed understandings of conversations, is based on, among other things, analysis of open-source information, including social media websites and internet forums where prostitution is advertised and discussed; witness interviews; records, including records maintained by the Department of Homeland Security and the National Crime Information Center; evidence recovered during the arrest of CIBOROWSKI on or



about February 14, 2020, and a subsequent search of two cellular telephones possessed by CIBOROWSKI; historical and prospective location information for a phone used by DANILUK; draft (not final or verbatim) translations and summaries of recorded jail calls; my own observations and actions; information received from other law enforcement agents; my training and experience; and the training and experience of other law enforcement agents. Quotations in this Affidavit, including those involving translation from Polish, are preliminary, and all dates and times are approximate. Because this Affidavit is being submitted for a limited purpose, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that CIBOROWSKI and DANILUK committed the offense alleged in the Complaint.

#### **I. Introduction and Summary of Investigation**

4. Law enforcement, including Homeland Security Investigations (“HSI”) and U.S. Customs and Border Protection (“CBP”), is investigating multiple known and unknown subjects, in Chicago and elsewhere, believed to be connected with a criminal organization that has, since at least approximately 2016, imported at least a dozen women into the United States for purposes of prostitution. The prostitution operation, which employs Polish and Eastern European women at multiple locations in northwest Chicago and nearby suburbs, is often referred to as “Norridge Girls,” “NG,” or “NG 2.0” in online forums where prostitution is advertised and discussed. The primary subjects identified to date are MARCIN CIBOROWSKI (also known as

“Rafal Golaszewski”), MARIUSZ DANILUK (also known as “Karol”), Mateusz Dzielski, Roman Karol Gajewski (also known as “the Sheriff”), and Rafal Surala (also known as “Michael”).

5. In summary and as explained in greater detail below:

a. The investigation has revealed that the subjects recruited women from Poland and other Eastern European countries to engage in prostitution in the United States. At least some of the recruited women were misled to believe that they were being recruited by a large and prominent escort agency, or recruited for sex work involving travel, gentlemen, “yachts,” and “hotels.” When the women arrived in Chicago, they were taken to a small house or apartment, where they were expected to work as prostitutes seven days a week for twelve hours a day, except for occasional trips out to pick up groceries or wire money back home. The women kept half of their fees (which were set for them); they were expected to turn over the other half to the managers of the operation. One of the women told law enforcement that she was repeatedly beaten by clients but nothing was done to stop the abuse; instead, she was warned not to call the police. After a few weeks or months, the women returned to their home countries and a new group cycled into the operation. Several women made repeated trips to the United States to work for the operation.

b. Multiple women who worked for the Norridge Girls operation reported that the organization was managed by, among others, two Polish men who went by the names “Michael” and “Karol.” In approximately June 2019, law enforcement determined that “Michael” is in fact RAFAL SURALA, a Polish man who



was deported to Poland in approximately November 2019. In approximately February 2020, law enforcement also determined that “Karol” is in fact MARIUSZ DANILUK, a Polish national currently residing in the Chicago area after being released on bond for immigration violations.

c. Also in approximately February 2020, law enforcement identified and arrested MARCIN CIBOROWSKI, another Polish national without lawful status in the United States, on immigration violations. Incident to CIBOROWSKI’s arrest, officers seized multiple items connecting him with DANILUK and suggesting that CIBOROWSKI was involved in managing the Norridge Girls operation. Law enforcement later obtained a warrant to search CIBOROWSKI’s cellular phones and discovered substantial evidence of CIBOROWSKI’s active involvement in the operation, including but not limited to: WhatsApp and other text messages showing that he communicated with the escorts and DANILUK regarding escort advertisements, client loads, prices and profits, and travel arrangements into and out of the United States; photos of escorts’ passports showing that he tracked the true identities and appearances of the women working for the operation; evidence that he used cameras to monitor the comings and goings of women and clients; and emails indicating that CIBOROWSKI controlled at least ten separate email accounts used to facilitate the Norridge Girls prostitution operation, including by creating and paying for (including with Bitcoin) hundreds of advertisements for Norridge Girls escorts.

d. Since approximately February 14, 2020, CIBOROWSKI has been held in administrative custody pending removal to Poland by U.S. Immigration and Customs Enforcement (“ICE”). (His removal has been delayed by the suspension of flights during the ongoing coronavirus pandemic.) During this time, CIBOROWSKI has repeatedly spoken on a recorded jail line with DANILUK. During the calls, the men expressed their hope that law enforcement would not search CIBOROWSKI’s phones and learn about their “work,” and used thinly veiled code to discuss their prostitution business—including the names, locations, arrival dates, and number of clients for several “girls” from Poland, Russia, Ukraine, and the Czech Republic; the challenges of paying bills and expenses for the business; and their use of video cameras to monitor one or more of the prostitution locations. These calls make clear (among other things) that DANILUK, with the assistance of Dzielski, has continued to manage the Norridge Girls operation in CIBOROWSKI’s absence.

**II. After a border encounter with a woman who previously worked as a Norridge Girls escort, law enforcement developed a profile of the operation and identified additional suspected Norridge Girls escorts.**

**A. Interview with Individual 1 on February 26, 2019.**

6. In February 2019, Individual 1, a foreign national, arrived at O’Hare International Airport (“O’Hare”) in Chicago, and sought admission to the United States. During a routine interview with CBP officers, Individual 1 claimed in a sworn statement that she was traveling to the United States to visit a friend named “Kevin,” and to investigate potential business opportunities for her uncle’s pallet-manufacturing company.



7. CBP conducted a border search of Individual 1's phone and discovered text messages suggesting that Individual 1 had engaged in prostitution during a previous trip to the United States. When asked about the text messages, Individual 1 admitted that she had previously worked as a prostitute during a trip to the United States in approximately September 2018.<sup>1</sup> During a subsequent in-custody interview with CBP officers, Individual 1, who spoke conversational English, provided substantially the following information:

a. Individual 1 was recruited to engage in prostitution in the United States by a woman in Poland whom Individual 1 knew as "Iza," Individual 1 later provided law enforcement with a Poland-based phone number for "Iza."

b. Individual 1's prostitution activities were organized by "Karol," "Michael," and Michael's wife, whose name Individual 1 did not know.<sup>2</sup> Individual 1 later provided a U.S.-based phone number for Michael.

c. Individual 1 worked with two other Polish women at 7512 West Belmont Avenue in Chicago (the "Belmont Location").<sup>3</sup> Individual 1 believed that Michael and Karol also operated a location across the street from a "big gas station"

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<sup>1</sup> According to travel records, Individual 1 previously traveled to the United States in approximately September and October 2018.

<sup>2</sup> As discussed in more detail below, during an interview in February 2020, Individual 1 was shown several photo lineups. She identified MARIUSZ DANILUK as "Karol," identified RAFAL SURALA as "Michael," and identified Individual 20 as Michael's wife.

<sup>3</sup> Individual 1's phone contained a video of two women speaking in Polish, sitting on a couch in what appeared to be a small apartment. The "geotag" data associated with the video file indicated that the video was taken near the Belmont Location.

near the intersection of Nagle Avenue and Northwest Highway in Chicago (the “Nagle Location”).

8. Individual 1 was denied entry into the United States, and departed the country on a flight to Copenhagen, Denmark. Law enforcement made no threats or promises to Individual 1.

**B. Using open-source research, law enforcement identified basic details about the Norridge Girls operation, including its advertising patterns, suspected locations, and standard prices.**

9. Among the text messages on Individual 1’s phone, law enforcement discovered the following exchange between Individual 1 and a suspected “client”:

Client: I found that there were some forums being shared

Found out that the girls are known as ‘NG’;  
‘Norridge Girls’ based on geographic incall locations.

And people are taking [sic] about there are many great companions in NG right now

Individual 1: What does it mean

Client: You are part of ‘Norridge Girls’

Individual 1: I don’t understand what is that

Client: People think that there is an agency for you but nobody knows the name

So people are calling it a nickname

10. Law enforcement was previously aware of a Chicago-based prostitution operation referred to as “Norridge Girls,” “NG,” or “NG 2.0” on certain prostitution-related internet discussion forums, including “usasexguide.nl.” Based on my training and experience, and that of other officers involved in this investigation, I know that



such forums are often used by solicitors of prostitutes, commonly known as “Johns,” to share information about various escorts and escort agencies.

11. Law enforcement sought to learn more about the Norridge Girls operation by reviewing multiple Norridge Girls-related postings on “usasexguide.nl.” According to one or more postings:

a. Norridge Girls escorts were typically from Poland or other countries in Eastern Europe. Their online advertisements shared common stylings and language, including the phrase “No African American Guys.”

b. The Norridge Girls “team” of escorts changed regularly as different women rotated into and out of the United States.

c. Norridge Girls escorts operated out of “in-call” locations in northwest Chicago and nearby suburbs, including locations at Belmont Avenue and Harlem Avenue in Chicago (the “Belmont Location”), at Nagle Avenue and Northwest Highway in Chicago (the “Nagle Location”), on Pine Grove Avenue in Chicago (the “Pine Grove Location”), and in Elk Grove Village, Illinois (the “Elk Grove Location” or “Subject Premises 1”).<sup>4</sup>

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<sup>4</sup> As discussed elsewhere in this Affidavit, and based on information obtained from various sources—including but not limited to interviews with Norridge Girls escorts (Individual 1, Individual 6, Individual 8, and Individual 13), and items seized during CIBOROWSKI’s arrest—law enforcement identified 7512 West Belmont Avenue as the likely address for the Belmont Location, 5830 North Nagle Avenue as the likely address for the Nagle Location, 3731 North Pine Grove Avenue as the likely address for the Pine Grove Location, and 615 Perrie Drive, Unit 407 as the likely address for the Elk Grove Location (Subject Premises 1). Based on information obtained during a border search of a suspected client’s phone, and Norridge Girls postings on prostitution forums, law enforcement also identified suspected locations in the 8600 block of West Foster in Chicago and the 4900 block of North Harlem in Harwood

d. “Clients” contacted Norridge Girls escorts directly using the phone numbers provided on their online advertisements. One post reported that “NG girls are available 7 days a week usually from 10 am to 10 pm. . . . If they don’t pick up when you call, send a text. Since they don’t have a scheduler, connecting with them can take some effort.”

e. The standard base prices for Norridge Girls escorts was \$170 per half hour and \$200 per full hour. During the second half of 2019, posters reported that the Norridge Girls operation attempted to raise base prices to \$200 for a half hour and \$250 for a full hour. In light of these and other changes, some posters began referring to the operation as “NG 2.0.”

**C. Law enforcement determined the probable true identities of several suspected Norridge Girls escorts.**

12. In discussing the attributes, locations, and arrival/departure dates of various Norridge Girls escorts, the posters on “usasexguide.nl” often referred to the women by their monikers used in online escort advertisements. Law enforcement searched numerous prostitution-advertising websites<sup>5</sup> for these escort names and identified advertisements for multiple suspected Norridge Girls escorts. The advertisements typically contained one or more pictures of the advertised woman, a

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Heights, Illinois. Law enforcement also believes that the Norridge Girls operation used additional locations at unverified addresses near the 6500 block of North Harlem in Chicago and near the 6700 block of North Northwest Highway in Chicago.

<sup>5</sup> Websites searched included “eros.com,” “eroticmonkey.com,” “escortalligator.eu,” “escortbabylon.com,” “escortindex.com,” “listcrawler.com,” “rubratings.com,” and “yesbackpage.de.”



contact phone number, and the date the advertisement was posted. Some advertisements also contained “expires on” dates.

13. Law enforcement then searched travel records (including photos taken upon admission into the United States) maintained by the Department of Homeland Security (“DHS”), focusing on females from Poland whose photographs and travel dates matched the photographs and posting dates from the online advertisements. As a result of this analysis, law enforcement identified the probable true identities for the following women pictured in suspected Norridge Girls escort advertisements:

<b>Approx. Dates of Escort Advertisements</b>	<b>Probable True Identity</b>	<b>Approx. Arrival in U.S. Matching Escort Ad Dates</b>	<b>Other Travel to U.S. (ID'd to date)</b>
Oct. 2018	Individual 2	Oct. 2018	none identified
Jan. 2019	Individual 3	Jan. 2019	multiple trips from 2012–2019
Feb. 2019	Individual 4	Feb. 2019	multiple trips from 2018–2019
Oct. 2019	Individual 5	Oct. 2019	multiple trips from 2017–2019
Mar. 2019	Individual 6	Mar. 2019	none identified
Oct. 2019	Individual 7	Oct. 2019	multiple trips from 2017–2019
May 2019	Individual 8	April 2019	None identified
May 2019	Individual 9	May 2019	multiple trips from 2013–2019
June 2019	Individual 10	June 2019	none identified
Aug. 2019	Individual 11	Aug. 2019	multiple trips from 2019–2020
Aug. 2019	Individual 12	Aug. 2019	multiple trips from 2019–2020
Aug. 2019	Individual 13	Aug. 2019	multiple trips from 2017–2019

14. In addition to the matches between the escort photos (and posting dates) and the DHS entrance photos (and travel dates), several other facts support the conclusion that the women identified above—all of whom were foreign nationals between 23 and 34 years old—worked for the Norridge Girls prostitution operation.

a. First, according to airline records, on multiple previous occasions several of the women identified above arrived in or departed from the United States

on the same flights, suggesting that the woman knew each other or traveled together, and consistent with the reports on prostitution-discussion forums (discussed above) that the Norridge Girls operation relied on rotating “teams” of women. For example:

i. In December 2018, Individual 5 and Individual 9 departed the United States on the same flight from John F. Kennedy International Airport (“JFK”) in New York to Warsaw, Poland.

ii. In March 2019, Individual 3 and Individual 4 departed the United States on the same flight from JFK to Moscow, Russia. In September 2019, Individual 3 and Individual 4 arrived at JFK on the same flight from Frankfurt, Germany. Within two days, law enforcement observed advertisements under escort names with photographs resembling Individual 3 and Individual 4. They were scheduled to depart in October 2019, on the same flight from JFK to Poland but (as discussed below) abandoned their reservations and ultimately departed on different flights.

iii. In October 2019, Individual 5 and Individual 7 arrived in the United States at San Francisco, California, on the same flight from Sydney, Australia. In December 2019, they departed the United States on the same flight from JFK to Frankfurt. Law enforcement also identified postings on Instagram accounts associated with Individual 5 and Individual 7 suggesting that they were friends and spent time together in Chicago.

iv. In August 2019, Individual 11 and Individual 12 arrived in the United States at JFK on the same flight from Paris, France. In September 2019, they departed the United States on the same flight from JFK to Paris. In December



2019, Individual 11 and Individual 12 arrived together at Newark, New Jersey, on a flight from Poland and (as discussed below) told CBP officers that they were friends who had previously traveled together in the United States.

b. Second, despite the availability of multiple daily flights between Warsaw and Chicago, the women listed above typically arrived in or departed from the United States from another city, such as New York, Los Angeles, or Miami. As discussed in greater detail below, law enforcement learned from interviews with several women that the organizers of the Norridge Girls operation deliberately arranged for or directed women to enter and depart the United States at locations other than Chicago. The women then used domestic flights, often booked on separate reservations, to travel to and from Chicago. Based on my training and experience and that of other officers involved in this investigation, I believe this was an operational security measure designed to make it more difficult for law enforcement to connect arriving and departing women with their ultimate destination in Chicago.

**III. During interviews with law enforcement, several of the women identified above admitted to working as prostitutes in Chicago and provided details about the Norridge Girls operation.**

15. Law enforcement identified outbound or inbound flight reservations for several of the women identified above and sought to interview these women when they arrived at the airport. As discussed below, one woman, Individual 4, denied engaging in unlawful employment in the United States. Three women—Individual 6, Individual 8, and Individual 13—admitted that they had worked as prostitutes for an organization in Chicago that matched the Norridge Girls operation discussed above.

They also reported, as had Individual 1, that the operation was led by “Michael”<sup>6</sup> and “Karol,” who set the women’s fees and collected half of their daily earnings.

**A. Interview with Individual 6 in April 2019.**

16. As discussed above, law enforcement determined that Individual 6 was likely one of the women traveling to the United States to work for the Norridge Girls prostitution operation. In April 2019, law enforcement confronted Individual 6, a foreign national, at O’Hare as she was preparing to depart the United States.<sup>7</sup> Individual 6 (who was fluent in English) provided substantially the following information:

a. Individual 6 previously engaged in commercial sex work in Poland and Germany. At some point she was recruited for commercial sex work in Chicago by a former client who told Individual 6 that the work would involve travel to destinations with gentlemen, with promises of “yachts and hotels.”

b. Individual 6 traveled from Warsaw to New York, where she stayed overnight with an associate of her former client’s, before flying to Chicago on a separate reservation. Her airfare was paid by her former client or a man whom Individual 6 knew as “Michael.” Ultimately there was a problem with the second

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<sup>6</sup> The women generally referred to this man, whom several identified as RAFAL SURALA, using the Slavic pronunciation of “Michal.” For the sake of clarity and consistency, in this Affidavit I will use the English-language name “MICHAEL.”

<sup>7</sup> When first approached by law enforcement at the airport check-in counter, Individual 6 became distraught and requested medical assistance. She was assessed by paramedics at the airport and refused to go to a hospital for further evaluation. Because she had complained of dizziness, officers escorted Individual 6 to her departure gate in a wheelchair. No threats or promises were made to Individual 6.



reservation from New York to Chicago, and Individual 6 had to purchase another ticket on her own. When she arrived in Chicago, Individual 6 contacted Michael (at a 773 number she provided to law enforcement), who picked her up at the Hilton Hotel at O'Hare. Individual 6 described Michael as a muscularly built Polish man, approximately 35 years old, and reported that he drove a "raised" or "lifted" white Audi A8.

c. Michael and a second man, whom Individual 6 knew as "Karol," were the "bosses" of the Chicago commercial sex operation, which Individual 6 heard they had operated for approximately seven or eight years. Individual 6 described Karol as a muscularly built Polish man, approximately 35 years old, either bald or with short blond hair. Individual 6 believed that Karol had recently been deported from the United States and may be living in the country illegally.

d. Individual 6 engaged in prostitution at a single-family residence at 5830 North Nagle Avenue in Chicago (the Nagle Location). The house had a security camera at the front door. Individual 6 worked at this location with another woman, and directed law enforcement to the woman's Facebook page, whom law enforcement identified as Individual 14 based on the Facebook profile's public-facing moniker, comments posted to the Facebook page, and a comparison of forum postings, escort advertisements, and DHS records. Individual 6 was aware that Michael and Karol had previously used an additional location on Belmont Avenue (the Belmont Location), but she believed that location had closed.

e. Individual 6 provided Michael with photographs to post on websites advertising commercial sex, including [www.megapersonals.com](http://www.megapersonals.com). Michael managed all the online advertisements for Individual 6 and Individual 14.

f. Michael gave Individual 6 a cellphone with a number that corresponded to her online escort advertisements. Individual 6 was responsible for managing her own scheduling and appointments.

g. Though her recruiter told Individual 6 that her commercial sex work would involve travel, gentlemen, yachts, and hotels, in reality she performed all “in-call” work at the Nagle Location. Individual 6 averaged between one and five clients per day. Her rates were set by Michael and Karol at \$170 per half hour and \$200 per hour. Individual 6 was permitted to keep half of the money she earned. At the end of each workday, Individual 6 put the other half of the money in an envelope and left it on the kitchen counter. Michael would pick up the money from the Nagle location every day around 8 a.m.

h. Individual 6 was beaten approximately ten or eleven times by clients who demanded to have intercourse with her without wearing condoms. Individual 6 provided law enforcement with photographs of herself with a bloody nose and bruises on her legs.

i. Michael was sometimes present in the house to provide “security,” but the only established distress signal was to scream. On the occasions when Individual 6 was beaten by the clients, Michael would never do anything to the



physically abusive clients. Michael told Individual 6 that she would have a problem if she called the police when clients beat her.

j. Another man, Mateusz Dzielski,<sup>8</sup> also sometimes provided security at the Nagle house, but he only worked on weekdays after 6:00 p.m., and never on Saturdays, which was Individual 6's busiest day.

k. Michael sometimes took Individual 6 and Individual 14 to Doma Shipping and Travel on Harlem<sup>9</sup> to wire money back to Poland. Individual 6 believed that she wired money back to Poland on approximately two occasions at Doma Travel; once in the amount of \$2,500 and once in the amount of \$1,000.

l. Michael became upset with Individual 6 because she didn't have many clients, and ultimately asked her to leave because she was not making any money. After she left the Nagle Location, she stayed one night with a former client and one night at a hotel before buying her own ticket to return to Poland. Individual 6 stated that the work conditions at the Nagle house made her "nervous" and caused "too much stress."<sup>10</sup>

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<sup>8</sup> Individual 6 identified Mateusz Dzielski by directing law enforcement to a Facebook page in his name. The person depicted in photos on the Facebook page matches DHS photos of Mateusz Dzielski, a 25-year-old Polish national and U.S. lawful permanent resident.

<sup>9</sup> Based on publicly available information, I believe this to be Doma Shipping and Travel, a travel agency and international parcel service focusing on Polish and Eastern European clients, located at 3414 North Harlem Avenue in Chicago.

<sup>10</sup> As discussed above, the women employed by the Norridge Girls operation typically arrived in and departed from the United States from an airport other than O'Hare in Chicago. Individual 6 did not follow that pattern in this instance, likely because she was required to leave abruptly and arrange her own travel.

17. After the interview, customs officials granted Individual 6's request for voluntary return to her home country, and she departed that day on a flight bound for Warsaw. Law enforcement advised Individual 6 that her visa had been cancelled, but made no threats or promises to Individual 6.

**B. Interview with Individual 8 in June 2019.**

18. As discussed above, law enforcement determined that Individual 8 was likely one of the women traveling to the United States to work for the Norridge Girls prostitution operation. In June 2019, after learning that Individual 8 planned to depart Chicago and travel to New York, law enforcement confronted Individual 8 at O'Hare regarding her connection with the Norridge Girls operation. During a voluntary interview, Individual 8 (who spoke conversational English) provided substantially the following information:

a. For approximately the previous six weeks, Individual 8 had engaged in prostitution in Chicago. She sought the work after seeing an online advertisement for commercial sex work with, purportedly, the largest agency in the world. Individual 8 called the number in the advertisement and spoke to a woman named "Katarzyna" or "Kasia," who offered Individual 8 a six-week contract to engage in commercial sex work. Individual 8 sent photos of herself to Katarzyna/Kasia by email. Katarzyna/Kasia provided Individual 8 with airfare from Poland to New York, and a separate ticket from New York to Chicago.

b. When Individual 8 arrived in Chicago, she took a taxi to a Hilton hotel, as instructed by Katarzyna/Kasia. Once at the Hilton, she was approached by



two men whom she knows only as “Michael” and “Karol.” Individual 8 believed that Michael’s true name may be “Adrian.” She described him as approximately 35–36 years old.<sup>11</sup> Individual 8 believed that Karol’s true name may be “Marieusz.” She described him as approximately 40 years old. Individual 8 believed that Karol had no lawful immigration status in the United States and that he “did bad things in Poland” like “cut fingers off.” Individual 8 believed that Karol was the “big boss” of the commercial sex operation, and that both Michael and Karol were involved in organized crime. She was scared to talk about them for fear of what they might do to her or her family.

c. Michael and Karol picked up Individual 8 in a newer-model white Jeep<sup>12</sup> and drove her to a residence at 7512 West Belmont Avenue in Chicago (the Belmont Location), where she and other women resided and engaged in prostitution. Michael gave her a telephone to use for booking clients and directed her work at that location. Individual 8 served between two and ten clients per day, with appointments typically starting at 10:00 a.m. and ending at 10:00 p.m.

d. Michael set Individual 8’s rates at \$170 per half hour and \$200 per hour. Individual 8 was allowed to keep half of her fees plus any tips. She placed the other half of her fees in an envelope in a box under a television at the Belmont Location. Michael or Karol would pick up the money every day between 8:30 and 9:00

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<sup>11</sup> As discussed in more detail below, during a second interview in June 2019, Individual 8 viewed a photo lineup and identified RAFAL SURALA as “Michael.”

<sup>12</sup> During the interview, Individual 8 used her phone to search for images of the vehicle and showed law enforcement pictures of a late model Jeep Grand Cherokee.

a.m. Over the past six weeks, Individual 8 earned approximately \$38,000 and gave approximately \$18,000 to Michael and Karol.

e. Individual 8 understood that Michael and Karol had operated out of the Belmont Location for eight or nine years, and believed that they were able to do so by paying off local police. The woman who ran a tailor shop at the front of the Belmont Location<sup>13</sup> was aware of the prostitution business.

f. After approximately 6:00 p.m. each day, a man would sit in the common area of the Belmont Location to provide security. Individual 8 did not know the man's name, but she and the other women at the Belmont Location referred to him as "the Sheriff." She described him a grey-haired Polish man in his 60s, and reported that he drove an older-model Toyota.

g. Michael posted online advertisements for Individual 8.

h. Once or twice a week, Michael or Karol took Individual 8 and the other women to a Western Union location on Harlem Avenue in Chicago<sup>14</sup> to wire funds back to their home countries. Individual 8 sent most of her earnings back home. Michael and Karol also took the women grocery shopping. Michael and Karol typically drove a white, late-model Jeep, and typically parked in the rear of the Belmont Location and entered through a back door, rather than the side door where Individual 8 and the other women would greet their clients.

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<sup>13</sup> Based on the investigation to date and publicly available information, the front of the Belmont Location is a commercial storefront with a tailor shop. The rear of the building, facing away from the street, is the residence described by Individual 8.

<sup>14</sup> I believe this is the same Doma Shipping and Travel location discussed above.



19. After the interview, Individual 8 was allowed to board her flight to New York City. As discussed below, three days later, law enforcement interviewed her again at JFK in New York in order to conduct photo lineups. Law enforcement made no threats or promises to Individual 8.

**C. Interview with Individual 4 in September 2019.**

20. As discussed above, law enforcement determined that Individual 4 was likely one of the women traveling to the United States to work for the Norridge Girls prostitution operation. In September 2019—after learning that Individual 4 had purchased a day-of, one-way ticket from Chicago to Warsaw even though she was already scheduled to depart the United States two days later—law enforcement confronted Individual 4 at O'Hare regarding her connection with the Norridge Girls operation. During a consensual interview conducted in Polish by a Polish-speaking CBP officer, Individual 4 provided substantially the following information:

a. When asked about her last-minute ticket purchase, Individual 4 stated that she had been robbed and mugged and simply wanted to leave immediately. She was visibly shaken when describing her experience.

b. Individual 4 claimed that she had come to the United States to visit friends earlier that month. She could not provide the names of the friends or any specific information on where she resided during her stay.

c. Individual 4 claimed that she had entered the United States with approximately \$10,000, and failed to disclose this fact to customs officials when she arrived. She stated that she was leaving with approximately \$4,000, and spent the

remaining \$6,000 on food, water, and daily expenses, but could not describe where or what she ate. Officers searched Individual 4's person and belongings and found approximately \$6,815 in cash, primarily in smaller bills. When asked about the small denominations, Individual 4 stated that was how the bank gave her the money. Officers also found receipts for a \$700 phone, and for the \$800 ticket Individual 4 had purchased at the airport ticket counter for her flight that day.

d. As discussed above, Individual 4 had entered the United States earlier in September 2019, traveling on the same flight as suspected Norridge Girls escort Individual 3. Individual 3 and Individual 4 had also previously departed the United States on the same flight in March 2019. Additionally, Individual 4 was scheduled to depart the United States two days later, on the same flight as Individual 3 from JFK to Frankfurt. When asked about her repeated travel with Individual 3, Individual 4 vehemently denied knowing Individual 3 and stated that their overlapping travel dates were coincidences.<sup>15</sup>

e. When asked if she had engaged in unlawful employment in the United States, Individual 4 became agitated and refused to answer further questions.

21. No immigration action was taken against Individual 4, and she was allowed to depart the United States on her scheduled flight to Warsaw. Law enforcement made no threats or promises to Individual 4.

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<sup>15</sup> DHS records showed that Individual 3 likewise failed to board her scheduled flight two days later, and instead departed the United States in November 2019 on a flight from JFK to Amsterdam.



**D. Interview with Individual 13 in November 2019.**

22. As discussed above, law enforcement determined that Individual 13 was likely one of the women traveling to the United States to work for the Norridge Girls prostitution operation. In November 2019, Individual 13 sought to enter the United States at O'Hare on a flight from Germany. During an in-custody interview conducted in English and Polish by a Polish-speaking CBP officer, Individual 13 provided substantially the following information:

a. Individual 13 admitted that, during previous trips to the United States, she worked as a prostitute for an organization in Chicago headed by a man she knew as "Michael,"<sup>16</sup> who had a partner she knew as "Karol."

b. On a previous trip to the United States, Individual 13 resided and engaged in prostitution at an apartment on Cumberland Avenue in the Chicago area. Michael came to the apartment about every two days to collect money from Individual 13 and the other women who lived there. Individual 13 would leave the money in the kitchen because customers were not allowed there. Individual 13 kept half of her fees and gave the other half to Michael. There were security cameras at the house, which Individual 13 understood Michael used to keep track of business.

c. Individual 13 was unaware who generated her online escort ads but was provided a cell phone to arrange meetings with interested clients.

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<sup>16</sup> As discussed in more detail below, during the interview Individual 13 viewed a photo lineup and identified RAFAL SURALA as "Michael."

d. During her most recent trip, Individual 13 worked for Michael at an apartment at 3731 N. Pine Grove Avenue in Chicago (the Pine Grove Location). The escort business was slow at this time.

e. Individual 13 heard rumors that Michael and Karol had terminated their business relationship, that Michael had been stopped by police in Florida, and that Karol had been arrested or deported by immigration authorities.

23. Individual 13 was processed as an inadmissible alien for violations of the Immigration and Nationality Act, and repatriated to Germany the following day. Law enforcement made no threats or promises to Individual 13.

**E. Interviews of Individual 11 and Individual 12 on December 28, 2019.**

24. As discussed above, law enforcement determined that Individual 11 and Individual 12 were likely two of the women traveling to the United States to work for the Norridge Girls prostitution operation. As noted above, in August and September 2019, Individual 11 and Individual 12 had previously arrived in and departed from the United States on the same flights.

25. In December 2019, Individual 11 and Individual 12 arrived in the United States at Newark, New Jersey aboard a flight from Poland. During individual interviews conducted in Polish by a Polish-speaking CBP officer, Individual 11 and Individual 12 provided inconsistent, contradictory, and at times false information.<sup>17</sup>

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<sup>17</sup> For example, Individual 11 claimed that she was traveling to Chicago to visit her boyfriend, who she said was "Mariusz Rafal Golaszewski," and whom she claimed to have met on Facebook approximately six months previously. Individual 12 also said that the two women were traveling to Chicago to visit their boyfriends, but she



They agreed, however, that they previously traveled to the United States together. They also both stated that they intended to travel to Chicago by flying into or through Milwaukee.<sup>18</sup> And one or both women provided CBP officers with the names and phone numbers of two men they intended to meet in Chicago: Rafal (or Mariusz Rafal) Golaszewski and Mariusz Rafal Daniluk.<sup>19</sup>

26. Law enforcement made no threats or promises to Individual 11 and Individual 12, who were admitted to the United States as non-immigrant visitors until June 27, 2020. As of the date of this Affidavit, DHS records show that Individual 11 has yet to depart the United States. DHS records show that Individual 12 departed the United States in January 2020, flying from O'Hare to

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claimed that "Rafal Golaszewski" was actually her boyfriend, not Individual 11's, and that Individual 11 had used a false name to conceal the true name of her boyfriend, which was Mariusz Rafal Daniluk. In addition, while Individual 12—who, according to the interviewing officer, was "very nervous and shaking" throughout the interview—claimed that she had known Individual 11 for more than ten years and previously traveled with her to the United States, she also insisted they weren't close friends and did not spend much time together during their previous trip. She also repeatedly stated, without being asked, that she did not know much about Individual 11 or what Individual 11 did in the United States.

<sup>18</sup> As discussed above, the organizers of the Norridge Girls operation often arranged for women to arrive in and depart from the United States at airports other than O'Hare, and then use standalone reservations to travel to Chicago. According to Individual 12, Golaszewski wanted Individuals 11 and 12 to travel to Chicago through Milwaukee because immigration in Chicago is too tough and stressful.

<sup>19</sup> Individual 11 also stated that her boyfriend—whom she said was named Golaszewski and whom Individual 12 said was named Daniluk—drove a white Audi A6 and lived with his wife and sixteen-year-old daughter in Schaumburg, Illinois. Individual 12 provided a birthdate for Golaszewski, whom she said operated a trucking company in Chicago and lived with his eleven-year-old child.

Warsaw. As further discussed below, Individual 12 returned to the United States on or about February 14, 2020, leading to the arrest of MARCIN CIBOROWSKI.

**IV. Identification of RAFAL SURALA, Individual 20, ROMAN KAROL GAJEWSKI, MARIUSZ DANILUK, and MARCIN CIBOROWSKI.**

**A. Identification of “Michael” as RAFAL SURALA.**

27. As discussed above, several Norridge Girls escorts stated that one of the managers of the operation was “Michael,” whom the women variably described as a muscularly built Polish man in his mid-30s who drove a white late-model Jeep Cherokee or a white Audi A8. The women reported that Michael, or his partner Karol, regularly dropped by the various prostitution locations to pick up the managers’ share of the women’s fees from the previous day.

28. On or about May 19, 2019, law enforcement observed a white, late-model Jeep Grand Cherokee, with Illinois license plate number ZY97446, arrive at the Belmont Location at approximately 2:55 p.m., and park in the back alley. A white, bald, muscularly built man exited the vehicle and appeared to enter the Belmont Location. Approximately twelve minutes later, the same man appeared to exit the residence, got back in the car, and drove away. According to records maintained by the Illinois Secretary of State, in May 2019, a 2016 Jeep Grand Cherokee with the license plate noted above was registered to RAFAL SURALA at an address in the 3000 block of Wickenden Avenue in Elgin, Illinois. SURALA’s driver’s license photograph and listed physical attributes matched the man observed at the Belmont Location on May 19.

29. As noted above, Individual 13 told law enforcement that she worked for Michael at 3731 North Pine Grove Avenue in Chicago (the Pine Grove Location), and



that she heard from other women that Michael had been stopped by police in Florida. According to information obtained from a public-records clearinghouse service, between approximately June 2019 and October 2019, RAFAL SURALA was listed as a utilities customer at the Pine Grove Location. In addition, law enforcement records indicate that SURALA was arrested by the U.S. Marshals Service in Newport, Tennessee, on or about October 25, 2019. He was extradited to Poland on or about November 26, 2019.<sup>20</sup>

30. Based on the information above, HSI prepared a photo lineup containing a photo of SURALA and five other males who are not subjects in this investigation.

a. In June 2019, during an in-person interview at JFK in New York, law enforcement presented Individual 8 with two lineups, including the lineup containing SURALA's photo. Individual 8 identified SURALA as "Michael," with a high degree of confidence.

b. In November 2019, during an in-person interview at O'Hare in Chicago, law enforcement presented Individual 13 with the lineup containing SURALA's photo. Individual 13 identified SURALA as "Michael," with a high degree of confidence.

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<sup>20</sup> According to information obtained from INTERPOL, SURALA was wanted by Polish authorities to serve additional time on a conviction for robbery committed "using [a] VW Passat processed to look like a police car, police uniforms, firearms, under the pretext of a roadside check."

c. In February 2020, during a video interview,<sup>21</sup> law enforcement presented Individual 1 with several lineups, including the lineup containing SURALA's photo. Individual 1 identified SURALA as "Michael," with a high degree of confidence. Consistent with her prior statements made in February 2019, Individual 1 stated that Michael helped operate the Belmont Location, including by transporting women to and from the airport, taking them out to shop or send money back home, and collecting money from the women each day. Individual 1 further stated that the boss of the prostitution operation, Karol (whom, as discussed below, Individual 1 identified as MARIUSZ DANILUK), assisted Michael in providing transportation, and that Michael and Karol drove expensive cars, including an Audi, a BMW, and a Jeep.

**B. Identification of Michael's wife as Individual 20.**

31. As discussed above, Individual 1 reported that her prostitution in the United States was organized by Karol, Michael, and Michael's wife, whose name Individual 1 did not know.

32. According to DHS records, on or about August 26, 2015, Individual 20, a naturalized U.S. citizen, submitted a form I-130 Petition for Alien Relative in support of an application for lawful permanent resident status for her spouse, RAFAL SURALA.

33. Based on this information, HSI prepared a photo lineup containing a photo of Individual 20 and five other females who are not subjects in this

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<sup>21</sup> At the time of the interview, Individual 1 was in an Eastern European country and the HSI personnel conducting the lineup were in Chicago.



investigation. On or about February 25, 2020, during the video interview described above, law enforcement presented Individual 1 with several lineups, including the lineup containing Individual 20's photo. Individual 1 identified Individual 20 as the Polish female known to her as Michael's girlfriend or wife.

**C. Identification of "the Sheriff" as ROMAN KAROL GAJEWSKI.**

34. As discussed above, during an interview conducted in June 2019, Individual 8 stated that a man—whom she and the other women at the Belmont Location referred to as "the Sheriff"—would provide security after 6:00 p.m. at the Belmont Location. Individual 8 described "the Sheriff" as a grey-haired Polish man in his 60s, and reported that he drove an older-model Toyota.

35. According to information obtained from a public-records clearinghouse service, between approximately July 2018 and February 2019, ROMAN KAROL GAJEWSKI was listed as a utilities customer at 5830 North Nagle Avenue in Chicago (the Nagle Location), where Individual 6 stated she worked as an escort for Michael and Karol's prostitution operation. According to records maintained by the Illinois Secretary of State, GAJEWSKI is the registered owner of a 2000 Toyota Avalon with Illinois license plate number 2493362.<sup>22</sup>

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<sup>22</sup> The vehicle was registered to GAJEWSKI at an address in the 7600 block of West Belmont Avenue in Chicago. Records also showed that GAJEWSKI had been issued an Illinois driver's license with a listed address in the 3200 block of N. Octavia Avenue in Chicago. On two or more occasions in approximately June and July 2019, law enforcement observed GAJEWSKI's Toyota Avalon parked near the Belmont Location, which is less than a half mile from GAJEWSKI's two addresses noted above.

36. Based on the information above, HSI prepared a photo lineup containing photos of GAJEWSKI and five other males who are not subjects in this investigation.

a. In June 2019, during an in-person interview at JFK in New York, law enforcement presented Individual 8 with two lineups, including the lineup containing GAJEWSKI's photo. Individual 8 identified GAJEWSKI as "the Sheriff," with a high degree of confidence.

b. In February 2020, during the video interview described above, law enforcement presented Individual 1 with several lineups, including the lineup containing GAJEWSKI's photo. Individual 1 identified GAJEWSKI as a Polish male who provided security at the Belmont Location. Individual 1 believed GAJEWSKI may have leased the Belmont Location in his name.

**D. Identification of "Karol" as MARIUSZ DANILUK.**

37. As discussed above, several Norridge Girls escorts stated that one of the managers of the operation was "Karol," whom the women variably described as a muscularly built Polish man between 35 and 40 years old, either bald or with short blond hair. Some of the woman believed that Karol had previously been arrested or deported and may have been living illegally in the United States. Individual 8 stated that Karol sometimes drove a white Jeep, and believed that Karol's true name was "Marieusz," which I know is an alternative spelling of "Mariusz."

38. Separately, and as discussed above, during an interview in December 2019, Individuals 11 and 12 reported that they were traveling to Chicago to meet their boyfriends, and provided the names and phone numbers for "Rafal Golaszewski"



(or “Mariusz Rafal Golaszewski”) and “Mariusz Rafal Daniluk.” Individual 11 also reported that her boyfriend—whom she said was named Golaszewski and whom Individual 12 said was named Daniluk—drove a white Audi A6 and lived with his wife and 16-year-old daughter in Schaumburg, Illinois.

39. After the encounter with Individuals 11 and 12, law enforcement searched various records for the name “Mariusz Daniluk.”

a. According to DHS records, MARIUSZ DANILUK, born in 1981, was arrested by ICE in March 2019 and placed into administrative removal proceedings for immigration violations. He was later released on bond. DHS records indicate that this DANILUK has a 16-year-old daughter with a name matching that provided by Individual 11.

b. According to DHS records, MARIUSZ DANILUK is married to Individual 15, who is the daughter of Individual 16 and Individual 17. According to records maintained by the Illinois Secretary of State, a 2015 white Audi A8 is registered to Individual 16 at a listed residential address in Lake in the Hills, Illinois. In addition, a 2016 white Jeep Grand Cherokee<sup>23</sup> is registered to Individual 17 at a residential address in Algonquin, Illinois. In March 2019, DANILUK was arrested on immigration violations outside this residence, and stated to arresting authorities that he resided at the Algonquin house.

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<sup>23</sup> The listed vehicle identification number (“VIN”) for the white Jeep registered to Individual 17 is different from the VIN for the white Jeep registered to SURALA.

40. Based on the information above, HSI prepared a photo lineup containing photos of DANILUK and five other males who are not subjects in this investigation. In February 2020, during the video interview described above, law enforcement presented Individual 1 with several lineups, including the lineup containing DANILUK's photo. Individual 1 identified DANILUK as "Karol." Consistent with her prior statements made in February 2019, Individual 1 stated that Karol was the boss of the prostitution operation. She further stated that Karol assisted Michael (whom, as discussed above, Individual 1 identified as RAFAL SURALA) in transporting her and the other escorts, and that the two men drove expensive cars, including an Audi, a BMW, and a Jeep.

**E. Identification of "Rafal Golaszewski" as MARCIN CIBOROWSKI.**

41. As discussed above, during an interview in December 2019, suspected Norridge Girls escorts Individual 11 and Individual 12 reported that they were traveling to Chicago to meet their boyfriends, and provided law enforcement with the names Rafal (or Mariusz Rafal) Golaszewski and Mariusz Rafal Daniluk. Individual 12 also provided a contact number and birthdate for Golaszewski, and reported that he operated a trucking business and lived with an 11-year-old child in Chicago.

42. After the encounter with Individuals 11 and 12, law enforcement searched various records for the name "Rafal Golaszewski."

a. According to DHS records, Rafal Golaszewski is an alias name for MARCIN CIBOROWSKI, a Polish national deported from the United States in



approximately 2002. Pursuant to his deportation, CIBOROWSKI was barred from reentering the United States, without permission from the Attorney General, for a period of ten years from the date of his removal, which occurred on March 25, 2002. Based on the criminal history records discussed below, CIBOROWSKI (under the Golaszewski alias) was arrested in the United States in 2005 and 2007, indicating that he illegally reentered the country within ten years of his deportation. In addition, and based on DHS records, CIBOROWSKI (under his true name or any of his known aliases) has not legally entered the country since his deportation, suggesting that, if he were in the country, he lacked legal status.

b. A criminal history search for CIBOROWSKI revealed that, based on fingerprint comparisons, he has been arrested at least twice under the name CIBOROWSKI (in 1996 in Pennsylvania for theft and prowling offenses, and in 1997 in New York for felony assault), and at least three times under the name Golaszewski (in Illinois in 2005 for a false affidavit offense, in Minnesota in 2007 for providing a false name to police, and in Illinois in 2016 for DUI).

c. DHS records listed "Piotr Nloszonek" as an additional alias for CIBOROWSKI, and the criminal history report listed "Krzysztof Kukowak" as an additional alias for Golaszewski.

d. The criminal history and DHS records list a date of birth for Golaszewski as August 31, 1981, and a date of birth for CIBOROWSKI as September 15, 1976. The listed birth date for CIBOROWSKI is the same date and month

Individual 12 provided law enforcement for Golaszewski. (Individual 12 indicated that she believed Golaszewski was born in 1979 rather than 1976.)

43. As noted above, beginning in approximately August 2019, posters to prostitution-related internet forums began reporting that Norridge Girls escorts were operating out of a location in Elk Grove Village (the Elk Grove Location or Subject Premises 1). Based on a search of public records, law enforcement identified a residence associated with CIBOROWSKI (under the Golaszewski alias) in the 600 block of Perrie Drive in Elk Grove Village, Illinois. On or about February 13, 2020, law enforcement conducting surveillance at this location observed a man resembling CIBOROWSKI's prior immigration booking photo and Golaszewski's Illinois driver's license photo. The man was driving a black BMW X6 with Illinois license plate number BR76140. According to records maintained by the Illinois Secretary of State, this vehicle is registered to Individual 22. According to DHS records, Individual 22's maiden name is Ciborowska, which I know, based on consultation with a Polish-speaking officer involved with this investigation, is the female form of the surname CIBOROWSKI.

**V. After MARCIN CIBOROWSKI arrived at the airport to pick up Individual 12, law enforcement arrested him on suspected immigration violations and recovered evidence connecting CIBOROWSKI to DANILUK and the Norridge Girls operation.**

44. On or about February 14, 2020, Individual 12 arrived with her young daughter at O'Hare on a flight from Warsaw. Based on information available in DHS databases, law enforcement determined that they were traveling on round-trip tickets purchased by CIBOROWSKI, using his alias, "Rafal Golaszewski."



**A. Interview of Individual 12 on February 14, 2020.**

45. During an in-custody interview conducted in Polish by a Polish-speaking CBP officer, Individual 12 claimed in a sworn statement that she received the tickets from Individual 22, whom Individual 12 stated was her daughter's grandmother and Golaszewski's sister. Individual 12 stated that she was no longer in a romantic relationship with Golaszewski, but that they remained friends and spoke daily. Individual 12 claimed she was coming to the United States to visit Disneyland in Orlando with her daughter and Individual 22.

46. HSI agents conducted a border search of Individual 12's phone and discovered, among other things, Facebook Messenger messages between Individual 12 and a contact listed as "Rafal Golasz." The messages indicated, contrary to Individual 12's sworn statements, that Individual 12 and Golaszewski remained romantically involved and that Individual 12 intended to immigrate to the United States with her daughter. Agents also discovered a photo of Individual 12 matching a photo used in approximately August or September of 2019 in an online advertisement for the Norridge Girls prostitution operation.

47. Individual 12 was found inadmissible and repatriated to Poland with her daughter. Law enforcement made no threats or promises to Individual 12.

**B. Arrest and interview of CIBOROWSKI on February 14, 2020.**

48. On or about February 14, 2020, at approximately the time that Individual 12's flight arrived from Poland, law enforcement observed the black BMW X6 discussed above parked on the upper (departure) level at the international

terminal (Terminal 5) at O'Hare. Law enforcement approached the vehicle and identified the driver (and sole occupant) as CIBOROWSKI based on CIBOROWSKI's prior immigration booking photo and the Illinois driver's license photo in the name of Rafal Golaszewski. Law enforcement arrested CIBOROWSKI, who identified himself as Rafal Golaszewski, on suspected immigration violations. Officers also detained his vehicle; which Individual 22 picked up from the HSI office in Des Plaines, Illinois, on or about February 20, 2020.

49. Law enforcement seized or observed multiple items incident to CIBOROWSKI's arrest, including the following:

- a. two Apple iPhones ("Ciborowski's Phones");
- b. an Illinois ID card and driver's license in the name Rafal Golaszewski with a listed address of an apartment unit at 635 Perrie Drive in Elk Grove Village, Illinois;
- c. credit cards and bank deposit slips for accounts in the name of Rafal Golaszewski;
- d. invoices from Doma Travel, Inc. indicating that CIBOROWSKI (using the Golaszewski alias) paid approximately \$2,200 in cash for Individual 11's and Individual 12's December 2019 airfare to the United States, and paid approximately \$1873 in cash for Individual 12's and her daughter's February 2020 airfare to the United States;
- e. an electric bill in the name of Rafal Golaszewski for 615 Perrie Drive, Unit 407, Elk Grove Village, Illinois (the Elk Grove Location or Subject



Premises 1), which was in the same apartment complex as CIBOROWSKI's suspected residence, and two sets of keys marked "615 Perrie #407";

f. Western Union receipts for funds sent by Individual 21 to Individual 12; and

g. a Western Union receipt for funds sent by DANILUK to Individual 18, listing DANILUK's address as the same residence in Lake in the Hills, Illinois, where the 2015 white Audi A8 (discussed above) is registered to DANILUK's father-in-law, Individual 16.

50. CIBOROWSKI was identified by fingerprints as the same MARCIN CIBOROWSKI deported from the United States in 2002. During an in-custody interview and after waiving his *Miranda* rights (under the alias Rafal Golaszewski), CIBOROWSKI—who spoke fluent English—claimed that Golaszewski was his true identity, that he entered the United States on a non-immigrant visa approximately ten years ago and had never been deported, and that he was at the airport with his cousin, Individual 22, to pick up Individual 12, with whom he denied being in a romantic relationship.

**C. Second interview of CIBOROWSKI on February 20, 2020.**

51. On or about February 20, 2020, after again waiving his *Miranda* rights under his true name, CIBOROWSKI provided substantially the following information:

a. CIBOROWSKI admitted that his true name was MARCIN CIBOROWSKI and that Rafal Golaszewski was an assumed alias.

b. CIBOROWSKI reentered the country approximately ten years ago, in around 2010. He paid approximately \$7,000 to a smuggling organization in Poland to transport him over the U.S.-Mexico border.

c. Shortly after CIBOROWSKI reentered the United States, a friend put him in contact with a document vendor. CIBOROWSKI paid approximately \$2,000 for a genuine state ID and driver's license in the name of Rafal Golaszewski. CIBOROWSKI believed the document vendor had a contact at the Illinois Secretary of State's office with the ability to issue genuine identity documents. CIBOROWSKI subsequently renewed the state ID and driver's license.

d. CIBOROWSKI later used the Golaszewski identity documents to apply for and obtain an Illinois commercial driver's license under his assumed identity.

## **VI. CIBOROWSKI's and DANILUK's Jail Calls**

52. Since his arrest on or about February 14, 2020, CIBOROWSKI has been held in ICE administrative custody pending removal to Poland at the McHenry County Jail in Woodstock, Illinois. While in administrative custody, CIBOROWSKI<sup>24</sup>

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<sup>24</sup> The identification of CIBOROWSKI's voice in the calls discussed below is based on, among other things, the following: (1) CIBOROWSKI's name or inmate ID number are listed as the calling party on jail call logs obtained from the McHenry County Jail, which I know from my training and experience requires inmates to use a unique identifier to make phone calls, and monitors inmate phone calls to prevent one inmate from using another's identifying credentials; (2) during a call on or about February 15, 2020, at approximately 9:08 a.m., CIBOROWSKI discussed his February 14 arrest, including law enforcement's seizure of CIBOROWSKI's Phones; (3) officers reviewing the calls recognized CIBOROWSKI's voice based on the two recorded interviews of CIBOROWSKI conducted on or about February 14 and 20, 2020; and



has used the jail's prisoner phone system to make multiple calls to DANILUK at (773) 814-6854 ("Daniluk Phone 1").<sup>25</sup> During various calls, the men expressed their hope that law enforcement would not search Ciborowski's phones and learn about their "work," and they used thinly veiled code to discuss the details of their prostitution business, including the names, locations, arrival dates, and number of clients being seen by several "girls" from Poland, Russia, Ukraine, and the Czech Republic; suspected prostitution locations in the northwest suburbs of Chicago; the need to pick up arriving women or take them to the store; the challenges of paying bills and expenses for the business; and their use of video cameras to monitor one or more of the prostitution locations. Their statements make clear that CIBOROWSKI and DANILUK were actively managing the Norridge Girls prostitution operation

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(5) the training, experience, and knowledge of this investigation as a whole possessed by the Polish-speaking officers who reviewed and summarized the calls.

<sup>25</sup> I believe DANILUK is the user of Daniluk Phone 1 in the communications summarized in this Affidavit based on, among other things, the following: (1) during a call on or about February 21, 2020, at approximately 8:01 p.m., CIBOROWSKI referred to DANILUK as "Karol," which is the same name used by one of the managers of the Norridge Girls operation, whom Individual 1 identified as DANILUK during a lineup conducted on or about February 25, 2020; (2) during a call on or about February 15, 2020, at approximately 9:03 a.m., with a person believed to be Individual 22 (and believed to be CIBOROWSKI's sister), CIBOROWSKI stated that he intended to call "Mariusz," and CIBOROWSKI's next call was to Daniluk Phone 1; (3) during a call on or about March 2, 2020, at approximately 6:51 a.m., CIBOROWSKI asked DANILUK about Individual 15, whom law enforcement believes is DANILUK's wife; (4) during a call on or about March 2, 2020, at approximately 11:18 a.m., CIBOROWSKI referred to a "burner" phone, and, according to information obtained from T-Mobile, there is no identified subscriber name or address information for Daniluk Phone 1, which has a listed service connection date in December 2019; and (5) the training, experience, and knowledge of this investigation as a whole possessed by the Polish-speaking officers who reviewed and summarized the calls.

discussed throughout this Affidavit, and that DANILUK was doing so while possessing Daniluk Phone 1. Excerpts from several calls are summarized below.<sup>26</sup>

53. On or about February 15, 2020, at approximately 9:08 a.m., CIBOROWSKI, using the prisoner phone system, called DANILUK, who was using Daniluk Phone 1. The call lasted approximately 10 minutes and 49 seconds, and included the following exchange, beginning approximately 2:22 into the call:

CIBOROWSKI: Hello.

DANILUK: What's up?

CIBOROWSKI: You know where I am?

DANILUK: Immigration?

CIBOROWSKI: Yes.

DANILUK: And what?

CIBOROWSKI: They got me when I was fucking parked. I was at the airport, cars pulled up, and they fucking pulled me out of the car. And you know, I don't know. They told me that I'm not me, that I'm Marcin, that kind of shit.

DANILUK: Oh ok. But . . .

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<sup>26</sup> The phone conversations summarized in this Affidavit took place primarily in Polish. The excerpts and summaries contained in this Affidavit are preliminary, non-verbatim English translations prepared by Polish-speaking law enforcement officers involved in this investigation. Those summaries—and any descriptions or understandings of those conversations indicated in brackets—and are based on, among other things, those officers' training and experience, the training and experience of other law enforcement agents, and those officers' knowledge of the investigation as a whole. The summaries contained in this Affidavit do not include all potentially criminal conversations that occurred during this investigation, or all statements or topics covered during the course of the phone conversations.



CIBOROWSKI: Listen, about work, don't fucking worry absolutely.

DANILUK: No?

CIBOROWSKI: No, no, no. They didn't ask.

After about a minute of additional conversation, the following exchange occurred approximately 3:53 into the call:

DANILUK: She [believed to be CIBOROWSKI's sister, Individual 22] can pick up your phones?

CIBOROWSKI: No. Probably not. That will have to be handled with the attorney. Because one is in my car and Tuesday she will have to go pick up my car.

DANILUK: Tuesday right?

CIBOROWSKI: Yes, Tuesday because Monday is some fucking holiday. But you know, I thought, maybe because of work or those things, but they didn't ask anything about my work or work.

DANILUK: Ya. They didn't look at the phones because when they stopped me [when DANILUK had previously been arrested by immigration authorities] they didn't look at my phones either.

CIBOROWSKI: No, no, no. Because I wanted a number from my phone. He told me give me your code and I'll give you the number. I said no because I didn't want him looking at my phone.

54. On or about February 21, 2020, at approximately 7:04 p.m., CIBOROWSKI, using the prisoner phone system, called DANILUK, who was using Daniluk Phone 1. The call lasted approximately 20 minutes, and included the following exchange, beginning approximately 2:05 into the call:

CIBOROWSKI: How's it going, what is going on?

DANILUK: Nothing really, it's going slowly. . . . The complainer called. You know which one?

CIBOROWSKI: The complainer, complainer, complainer?

DANILUK: The one from Russia.

CIBOROWSKI: [laughter] Is she here?

DANILUK: Yes, she's here.

CIBOROWSKI: When did she start?

DANILUK: Today.

CIBOROWSKI: [laughter] Fuck, I forgot. . . . Does she have a partner?

DANILUK: Yes. Meatball [believed to be the nickname for one of the female escorts].

CIBOROWSKI: Oh Meatball. And Meatball's female friend?

DANILUK: She's not here yet.

CIBOROWSKI: Fuck me, so Chicago [believed to be one of the prostitution locations] is empty then?

DANILUK: Yes.

After several minutes of additional conversation, the following exchange occurred, approximately 10:31 into the call:

CIBOROWSKI: So is anything interesting happening?

DANILUK: Nothing interesting, but fuck, it wasn't working you know what over there? You know?

CIBOROWSKI: There hasn't been any problems with the Russian?"

DANILUK: No. She arrived yesterday. Yesterday in the evening we picked her up. Today she started.



She did, you know, three or four [clients]. And she's complaining.

CIBOROWSKI: Did she start in the morning?

DANILUK: No, we went to the store in the morning. I went with her to the store because she said that she didn't have anything.

After several minutes of additional conversation, the following exchange occurred, approximately 19:24 into the call:

CIBOROWSKI: Where else has the Ukrainian been?

DANILUK: I don't know, I don't know.

55. Later that day, at approximately 8:01 p.m. CIBOROWSKI, using the prisoner phone system, called DANILUK, who was using Daniluk Phone 1. The call lasted approximately 20 minutes, and included the following exchange, beginning approximately 2:10 into the call:

CIBOROWSKI: Hello.

DANILUK: Yes.

CIBOROWSKI: [In a mocking voice and using a female tense] Karol, I'm crying and complaining today because it's Saturday.

DANILUK: Fucking guy. [In a mocking voice] To the store, to the store. [Laughter]

CIBOROWSKI: [In a mocking voice] Take me to the store. [Laughter]

DANILUK: She was in Miami for 10 days.

CIBOROWSKI: Super.

After several seconds of additional conversation, the following exchange occurred, approximately 2:49 into the call:

CIBOROWSKI: What's going on with O'Hare?

DANILUK: You know what, four, five, three [clients] or something like that.

CIBOROWSKI: Fuck me, the ass isn't pulling.

DANILUK: Yes, but you know it's half [staffed]?

CIBOROWSKI: Yes, yes, yes.

DANILUK: But now we have you know where?

CIBOROWSKI: The one where Sara was?<sup>27</sup>

DANILUK: Yes. . . .

. . . . .

CIBOROWSKI: Another girl is arriving on the 25th or 26th.

After several minutes of additional conversation, the following exchange occurred, approximately 17:15 into the call:

DANILUK: You know, the Meatball is ridiculous but today was four [clients] but yesterday was six [clients].

CIBOROWSKI: It seems like Meatball is worn, she let anyone at any time.

DANILUK: Yes, but you know to go with the Bitcoin to here, to there, to there, you know, with the other one it would be the same.

CIBOROWSKI: Yes, yes, yes.

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<sup>27</sup> Beginning in approximately December 2019, law enforcement observed postings on prostitution-related internet discussion forums about a suspected Norridge Girls escort using the name "Sara." Law enforcement searched escort advertisements and DHS travel records using the methodology described above and believes that "Sara" is likely Individual 19, a foreign national with multiple documented trips to the United States between 2017 and 2019.



DANILUK: You know this one's [a suspected prostitution location] empty for two more days.

CIBOROWSKI: Yes but today is only the 21st.

DANILUK: No, I changed it, the [female] Czech here and that one there.

After additional conversation, the following exchange occurred, approximately 18:49 into the call:

CIBOROWSKI: That one from Poland, is there a line with her? [believed to be referring to a recruiter in Poland and additional escorts ready to travel to the United States]

DANILUK: Yes. [crosstalk] . . . She writes for when so it's [a particular prostitution location] full. She has them [additional escorts] ready but you know they are from, you know.

After additional conversation, the following exchange occurred, approximately 20:07 into the call:

CIBOROWSKI: Ok, well we have the place for two more weeks.

DANILUK: Yes, but with this, that, and the ticket.

CIBOROWSKI: What time is it because . . . [inaudible] my watch?

DANILUK: Eight until twenty-one. [8:52 p.m.]

CIBOROWSKI: You're about to leave to go to them right?

DANILUK: No I'm waiting until they are you know what.

CIBOROWSKI: It's nine, they are finishing.

DANILUK: No, until ten, eleven.<sup>28</sup>

CIBOROWSKI: Oh, ok the one by O'Hare.

DANILUK: No, that one.

CIBOROWSKI: That fucking one [a particular escort] has such nice pictures.

DANILUK: They are ten years old. [the pictures used by the escort depict her from ten years ago]

56. On or about February 22, 2020, at approximately 9:26 a.m., CIBOROWSKI, using the prisoner phone system, called DANILUK, who was using Daniluk Phone 1. The call lasted approximately 13 minutes and 18 seconds, and included the following exchange approximately 2:10 into the call:

CIBOROWSKI: How's everything?

DANILUK: Fucked up.

CIBOROWSKI: What happened?

DANILUK: You know the ones from New York [believed to be associates of the Norridge Girls operation in New York], they fell off.

CIBOROWSKI: What are you fucking saying?

DANILUK: They were on him, they were on him.

CIBOROWSKI: And what?

DANILUK: Fuck, I don't know . . . three people. . . . They are not with me. They were asking.

CIBOROWSKI: Fuck, can a guy get no peace?

DANILUK: Ya, they were asking about you know who?

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<sup>28</sup> As discussed above, one or more Norridge Girls escorts told law enforcement that they were expected to operate from approximately 10:00 a.m. to 10:00 p.m. each day.



CIBOROWSKI: Ya, you know soon they will knock on his door.

DANILUK: You think so?

CIBOROWSKI: 100% because they have everything for sure . . . and who booked the hotel.

DANILUK: They said it was through a friend.

CIBOROWSKI: Fuck that we can't talk on the phone [because the calls were monitored]. . . . You took them from there right? Where are they now?

DANILUK: Some motel.<sup>29</sup>

CIBOROWSKI: Fuck now this has to change the whole job.

DANILUK: You know, those were the different ones though. I'll have to think of something but maybe won't have to change anything.

After several minutes of additional conversation, the following exchange occurred, approximately 7:45 into the call:

CIBOROWSKI: How did it go yesterday? With that one?

DANILUK: Five and maybe four [clients].

CIBOROWSKI: That's not that bad.

DANILUK: No. And over here four and six [clients].

CIBOROWSKI: Six for the Ukrainian [female] or the Polish [female]?

DANILUK: Yes, Ukrainian six [clients].

After additional conversation, approximately 9:40 into the call, CIBOROWSKI stated: "We should see what is going on in Arlington Heights . . . because O'Hare

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<sup>29</sup> During approximately the last week of February 2020, law enforcement observed several postings on prostitution-related internet discussion forums indicating that Norridge Girls escorts were operating out of a hotel in Rosemont, Illinois.

always sucked.”<sup>30</sup> The conversation continued until the following exchange, approximately 10:55 into the call:

CIBOROWSKI: What date is it . . . 21st? No the 22nd?

DANILUK: Yes.

CIBOROWSKI: Chicago [a prostitution location] is completely empty?

DANILUK: No, I didn’t want to change the [escort advertisement] photos, because it would be a waste [believed to refer to paid advertisement fees that would be lost if escort ads were changed to reflect a different location].

CIBOROWSKI: Yes, it would be a waste.

After additional conversation, the following exchange occurred, approximately 12:48 into the call:

CIBOROWSKI: Where are you heading to now?

DANILUK: I’m going over here because I had to do some shopping for ‘zabuga’ [slang term for a person from a particular region in Ukraine]. She needed this and that, this and that.

CIBOROWSKI: The complaining doesn’t stop.

57. On or about March 2, 2020, at approximately 11:18 a.m., CIBOROWSKI, using the prisoner phone system, called DANILUK, who was using Daniluk Phone 1. The call lasted approximately 13 minutes and 18 seconds, and included the following exchange, beginning approximately 2:20 into the call:

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<sup>30</sup> In approximately late February and early March 2020, law enforcement observed one or more forum postings or escort advertisements indicating that Norridge Girls escorts were operating out of a location in Arlington Heights, Illinois.



CIBOROWSKI: How's work, good?

DANILUK: Ya, we'll see, you know . . . but good, you know?

CIBOROWSKI: Mother fuck. And zabuga, she's upset?

DANILUK: Laughing.

CIBOROWSKI: Not that she's mad but ho ho ho.

DANILUK: [joking tone] You know, she's scared.  
[laughter]

CIBOROWSKI: Of course. [laughter]

DANILUK: Ya, ya [laughter and crosstalk]

CIBOROWSKI: And where else did she work? Do you know?

DANILUK: Dubai.

After several minutes of additional conversation, the following exchange occurred, approximately 9:30 seconds into the call:

CIBOROWSKI: But to Peter, ahhh fuck, you can't take it there right?

DANILUK: No.

CIBOROWSKI: Mother fuck. But no. I'll tell my sister or you, for you to log onto my iCloud because fuck all my numbers are in there.

DANILUK: Ya.

CIBOROWSKI: Because I have everything in the fucking phone and the burner and I can't get in the apartment and everything is there. But I hope not for long.

58. On or about March 12, 2020, at approximately 6:48 p.m., CIBOROWSKI, using the prisoner phone system, called DANILUK, who was using Daniluk Phone 1.

The call lasted approximately 21 minutes, and included the following exchange, beginning approximately 1:56 into the call:

CIBOROWSKI: How's everything?

DANILUK: Fucked up.

CIBOROWSKI: Why? What happened?

DANILUK: Nothing, fucking what happened, nothing's fucking happening.

CIBOROWSKI: Like zero, absolutely nothing, zero?

DANILUK: Totally nothing, totally fucking nothing.

CIBOROWSKI: What the fuck is it for fucks sake?

DANILUK: You know, no one knows what to do, I said you know some days are slower and of course I have to explain it right?

CIBOROWSKI: Yeah, yeah, yeah.

DANILUK: But you know, fucking . . . .

CIBOROWSKI: Motherfucker.

DANILUK: [inaudible; crosstalk]

CIBOROWSKI: Are there any takers [clients] though or not at all?

DANILUK: [crosstalk] I know, I know, yeah there are some, there are some, but everything is the same.

CIBOROWSKI: Yeah, everything's the same, of course.

DANILUK: Yeah, when it was six or four [clients] and one day when he blocked the thing let me tell you zero [clients] so what's the deal, fuck.

CIBOROWSKI: Fuck, and what, today it's also shitty?



DANILUK: Well that's what I'm saying yesterday there was something right?

CIBOROWSKI: Yeah, yeah.

DANILUK: But today, since the morning there's fucking nothing.

CIBOROWSKI: Fuck.

DANILUK: Today there's nothing, but yesterday I'm telling you, that yesterday there was six, four and five [clients] right.

CIBOROWSKI: Maybe it's just that type of fucking shitty day, was the weather warm today or no?

DANILUK: It's raining but a good day for work, you know?

CIBOROWSKI: Yeah. Yeah, yeah.

DANILUK: But fuck nothing man, zero fucking, you know responses.

CIBOROWSKI: Fuck, man fuck, what the fuck is this, since the morning they're talking about this corona shit, assholes.

DANILUK: Well you know fucking, I don't know, fucking it's like, I'm telling you, I am, you know, yesterday it was like you know, it was normal right?

CIBOROWSKI: Yeah, yeah, yeah.

DANILUK: But today fucking, nothing?

CIBOROWSKI: This is crazy fucking crazy.

DANILUK: I mean it has never fucking been like this.

CIBOROWSKI: Of course, yeah.

DANILUK: There was always something there.

CIBOROWSKI: Yeah, there was always something, I mean three, three fucking loads [believed to be locations used for prostitution].

DANILUK: Yeah, yeah, yeah.

CIBOROWSKI: Fucking weird, no bullshit.

DANILUK: And with two, three phones to call, two, three phones, all day.

CIBOROWSKI: [inaudible; crosstalk]

DANILUK: There's nothing.

CIBOROWSKI: Ah, so people got scared. Did you look at the posts or no? No one's saying anything?

DANILUK: I looked, I looked, over here, over here they [believed to be a reference to a different prostitution business] have these Russians over here right?

CIBOROWSKI: Yeah.

DANILUK: This other business right?

CIBOROWSKI: Yeah.

DANILUK: Only that, only that they have sixteen [believed to be a reference to the number of prostitutes working for a different operation].

CIBOROWSKI: Uhuh, uhuh.

DANILUK: You know, and they have these nice other things, you know nice, from the phone, you know?

CIBOROWSKI: Yeah, yeah, yeah.

DANILUK: She called, she was asking because since yesterday, and the day before, and today, they didn't have a single one.

CIBOROWSKI: So that means it's . . .



DANILUK: Sixteen, they have sixteen.

CIBOROWSKI: Yeah. So it's shitty everywhere.

DANILUK: Yeah, and she asked, can you ask if anything is happening there? Because here from three days.

CIBOROWSKI: But listen, and those girls are, and those girls are, I mean they live, where do they live? Normally in houses or where?

DANILUK: At their place?

CIBOROWSKI: Yeah.

DANILUK: No, at their place? No at their place, they are approving people from here.

CIBOROWSKI: Yeah, yeah, ok.

DANILUK: You know, and they have it for a long time, for example, you know, a year, you know.

CIBOROWSKI: Uhuh.

DANILUK: They come here to work.

CIBOROWSKI: Yeah, I know what you're saying.

DANILUK: You understand?

CIBOROWSKI: Mhm, mhm, but it's not that they're staying in houses but in like hotels and stuff like that right?

DANILUK: No, no, no, no. They have them, amazing.

CIBOROWSKI: Uhuh, uhuh, uhuh.

DANILUK: You know.

CIBOROWSKI: Uhuh, well shit, and also zero.

DANILUK: Yeah, for three days.

CIBOROWSKI: Yeah, yeah.

DANILUK: But here, here something was happening, you know, but fucking today, today fucking I'm in shock that there's zero.

CIBOROWSKI: Yeah, it's that type of day it seems, fuck. Who the fuck knows what to say, because I believe that since the morning talk about the corona . . . [inaudible] this fucking topic. I fucking believe it's because of this, you know?

DANILUK: I don't know, I also fucking think so.

59. On or about March 14, 2020, at approximately 6:40 p.m., CIBOROWSKI, using the prisoner phone system, called DANILUK, who was using Daniluk Phone 1. The call lasted approximately 21 minutes, and included the following exchange, beginning approximately 2:09 into the call:

CIBOROWSKI: So you're saying it's fucked at fucking work?

DANILUK: I'll tell you straight up, it's a massacre<sup>31</sup> right.

CIBOROWSKI: So what, zero [clients]? Completely nothing?

DANILUK: Oh you know, if there is someone then they're fucking crazy.

CIBOROWSKI: Yeah, yeah.

DANILUK: A guy will come and you know, with half of what is required and you know.

CIBOROWSKI: [laughing] Fuck.

DANILUK: But as for the normal ones, there really aren't any.

CIBOROWSKI: Of course [inaudible] . . . in the fucking balls.

DANILUK: And then one of them is sick you know?

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<sup>31</sup> This is a literal translation from the Polish word "masakra," meaning, in context, that everything is dead.



CIBOROWSKI: And what?

DANILUK: And then one of them is sick you know?

CIBOROWSKI: Oh ok, what happened?

DANILUK: But I don't know what, I don't know what, fucking fever, cough etc.

CIBOROWSKI: Uhuh, uhuh, let's hope it's not that fucking you know.

DANILUK: I don't know, I can't tell you [laughing] since yesterday.

CIBOROWSKI: Yeah, and if one is sick, the rest might be sick as well.

DANILUK: I don't fucking know, I don't know what it is, you know.

CIBOROWSKI: Fuck. You can't get her fucking checked out?

DANILUK: Well I can, but getting it checked out now is you know.

CIBOROWSKI: Yeah, and which one is sick?

DANILUK: Czech.

CIBOROWSKI: Oh for fuck's sake, for fuck's sake. What a ride. Regardless she won't . . . she won't, he<sup>32</sup> won't go anywhere anyway because no one can go anywhere.

DANILUK: You don't even have to say anything, only the military is flying.

CIBOROWSKI: Yeah, yeah, yeah, this is you know, they are only transporting military because only military is on the street there.

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<sup>32</sup> Though CIBOROWSKI used the male gender, based on context he still appears to be referring to the sick Czech woman discussed above.

DANILUK: Yeah, yeah.

CIBOROWSKI: Well that's shitty, but oh well, there's nothing you can do, have to wait and see.

DANILUK: There's nothing that can be done.

60. On or about March 16, 2020, at approximately 11:41 a.m., CIBOROWSKI, using the prisoner phone system, called DANILUK, who was using Daniluk Phone 1. The call lasted approximately 15 minutes, and included the following exchange, beginning approximately 2:10 into the call:

CIBOROWSKI: How's everything over there at our territory?

DANILUK: Nothing's happening.

CIBOROWSKI: [laughing] Nothing huh? Fuck me. A massacre right?

DANILUK: Yeah, calm and silent.

After several minutes of additional conversation, the following exchange occurred approximately 5:30 into the call:

DANILUK: I went to four stores, had to buy three packs of toilet paper, drove it there.

CIBOROWSKI: Yeah, and how's the sick one?

DANILUK: The sick one is better.

CIBOROWSKI: Ah, so then that means it's not corona.

DANILUK: But, I, I did not go inside.

CIBOROWSKI: Well, no no no, why the fuck would you.

DANILUK: I sent in [inaudible; crosstalk].

CIBOROWSKI: That's good, that's good.

DANILUK: Yeah.



CIBIROWSKI: Do the cameras work there or no?<sup>33</sup>

DANILUK: Yeah, they work they work.

CIBOROWSKI: But we will probably remove them, because you know the next payment probably won't go through.

DANILUK: Yeah, I know, I know. But I put up, I put up, you know, his, because I couldn't put him<sup>34</sup> on this one because it comes via text message.

CIBOROWSKI: Uhuh, Uhuh.

DANILUK: You know, to your phone.<sup>35</sup>

CIBOROWSKI: Yeah, Yeah.

DANILUK: If you want to add someone, you have to you know. There's no way to add someone.

CIBOROWSKI: No, of course there is a camera there.

DANILUK: What?

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<sup>33</sup> As discussed below, law enforcement discovered evidence on CIBOROWSKI's phones indicating that he used Nest-brand home surveillance cameras to monitor one of the prostitution locations. I believe that this portion of the conversation between CIBOROWSKI and DANILUK relates to these or similar cameras.

<sup>34</sup> In calls discussed below and in other calls not transcribed in this Affidavit, CIBOROWSKI and DANILUK often referred to the "red-head guy" or "the ginger." As discussed below, law enforcement believes that these phrases refer to Dzielski, who was assisting DANILUK with the prostitution operation in CIBOROWSKI's absence, including (as discussed below) by switching apartments to allow one of the escorts to operate out of his residence in Rosemont ("Subject Premises 2"). Based on this information and other context, law enforcement believes that "him" in the statement above refers to Dzielski.

<sup>35</sup> As discussed elsewhere in this Affidavit, law enforcement seized CIBOROWSKI's phones pursuant to his arrest on or about February 14, 2020, and law enforcement later discovered evidence on CIBOROWSKI's phones indicated that he used Nest-brand home surveillance cameras to monitor one of the prostitution locations. Based on this evidence and the context of the conversation, I believe that this portion of the conversation between CIBOROWSKI and DANILUK relates to the fact that CIBOROWSKI used his phones to manage the Nest cameras.

CIBOROWSKI: Of course there is a camera there.

DANILUK: But I'm saying for him [Dzielski] on his fucking phone.

CIBOROWSKI: Oh, so that he [Dzielski] can monitor.

DANILUK: I couldn't do it because it says a verification code is being sent to the cell phone with the account.

CIBOROWSKI: Believable, believable.

DANILUK: So I couldn't add him.

CIBOROWSKI: Believable, believable.

DANILUK: So I had to buy one and set it up there.

CIBOROWSKI: Ah, ok, ok, ok.

DANILUK: Yeah, it's a different one, you know. So now there's this one and that one.

CIBOROWSKI: Yeah, so those will be good for other purposes later, you know.

DANILUK: Yeah, yeah, yeah.

61. On or about March 29, 2020, at approximately 2:49 p.m., CIBOROWSKI, using the prisoner phone system, called DANILUK, who was using Daniluk Phone 1. The call lasted approximately 13 minutes, and included the following exchange, beginning approximately 6:42 into the call:

CIBOROWSKI: Anything happening at our territories or nothing?

DANILUK: Um, there is no fucking revelation, you know.

CIBOROWSKI: Of course of course, but there is some movement right?

DANILUK: It's hard to say that there is movement you know?

CIBOROWSKI: Ok. [laughing]

DANILUK: Yeah, I'm not sure if there's enough to make fucking payments, you know.

CIBOROWSKI: What the fuck are you saying?

DANILUK: You know, if it comes to making payments, you know.

CIBOROWSKI: Of course of course.

DANILUK: Yeah.

CIBOROWSKI: For fuck's sake.

DANILUK: Because you know, all the bills have to be paid.

CIBOROWSKI: Of course.

DANILUK: Internet, the fucking you know what.

CIBOROWSKI: Of course. Yeah, yeah, yeah.

DANILUK: You make payments and you know.

CIBOROWSKI: But zero fucking profit

DANILUK: Yeah. Well if she has two or three [clients], then count it.

CIBOROWSKI: Of course.

DANILUK: Then you only have five.

CIBOROWSKI: Of course, then you don't need a fucking niche. [Why continuing operating without demand?]

DANILUK: Yeah.

CIBOROWSKI: If only it was like that every fucking day at least, from poor to bread [from rags to riches], but four days there's nothing and two days there fucking is.



DANILUK: Of course, I mean, every time there is something, one, two, three [clients], you know, it's like that every day but, you know, fucking, take that a split it, fucking, take a room, take a room, then what, I mean fuck.

CIBOROWSKI: Of course of course, there's nothing fucking left of course.

DANILUK: And then you have to pay back for you know, for those you know what I mean?

CIBOROWSKI: I know I know yeah. I'm wondering how long this will fucking last still.

DANILUK: I don't have a clue.

## **VII. Evidence Discovered on CIBOROWSKI's Phones**

62. On April 9, 2020, Chief Judge Rebecca R. Pallmeyer issued a warrant authorizing the search of two cellular phones ("Ciborowski Phone 1" and "Ciborowski Phone 2," and collectively, "Ciborowski's Phones") seized from CIBOROWSKI incident to his arrest (discussed above) on or about February 14, 2020. On one or both of the phones, agents discovered additional evidence of CIBOROWSKI's involvement in the Norridge Girls prostitution operation, including but not limited to: WhatsApp and other text messages showing that he communicated with the escorts and DANILUK regarding escort advertisements, client loads, prices and profits, and travel arrangements into and out of the United States; photos of escorts' passports showing that he tracked the true identities and appearances of the women working for the operation; evidence that he used cameras to monitor the comings and goings of women and clients; and emails indicating that CIBOROWSKI controlled at least ten separate email accounts used to facilitate the Norridge Girls prostitution

operation, including by creating and paying for (including with Bitcoin) hundreds of advertisements for Norridge Girls escorts.

a. First, CIBOROWSKI Phone 2 contained WhatsApp and other text messages showing that CIBOROWSKI communicated with the escorts and DANILUK regarding, among other things, advertisements, client loads, prices and profits, and travel arrangements into and out of the United States. The messages also show that the women referred to CIBOROWSKI as “Sebastian.” For example:

i. On or about January 18, 2020, between approximately 5:29 p.m. and 11:50 p.m., Ciborowski Phone 2 exchanged the following WhatsApp messages with “Laura”<sup>36</sup>:

Laura:	Client
	Coming
	1 hour
	Finished. I forgot to write you, sorry
	Client is coming
	It's a black man
	He's leaving
	He traded in addition
	1 hour
CIBOROWSKI:	K
Laura:	Finished

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<sup>36</sup> Law enforcement believes that the true identify of “Laura” is the foreign national identified in this Affidavit as “Individual 25.”

CIBOROWSKI: Ok

Laura: I'm still waiting for 1 more

I'm off tomorrow no? I told her she can work if she wants. I'm going to sleep. And then I'm going to get my nails and pedicure

CIBOROWSKI: Ok

Laura: Client is coming

1 hour

Finished

Client is coming

1 hour

Finished

CIBOROWSKI: Ok

ii. On or about January 20, 2020, between approximately 3:43 p.m. and 11:50 p.m., Ciborowski Phone 2 exchanged the following WhatsApp messages with "Laura":

Laura: Sebastian, we need to change these pics because I honestly I haven't had two customers today and no calls

CIBOROWSKI: Today is a holiday, that's why

Laura: Ah, ok

So yes

I saw something yesterday

At the store

That something

So today is a day off of work



Ok

CIBOROWSKI: Not off. Just slow

Laura: Ok

iii. On or about January 21, 2020, between approximately 12:49 p.m. and 12:50 p.m., Ciborowski Phone 2 exchanged the following WhatsApp messages with "Laura":

Laura: I wrote to Karol  
Sorry, I forgot to write you  
For real, I forgot  
He came at 12:20  
He left

iv. On or about January 21, 2020, between approximately 7:39 a.m. and 7:02 p.m., Ciborowski Phone 2 exchanged the following text (iMessage) messages with "Kim Nowy":<sup>37</sup>

Kim Nowy: Hey, listen. Can you put on the profile some lighter pictures? Because the darker ones you can barely see.

I was kicked off the site. I have to log in again

CIBOROWSKI: aniapolska2019@gmail.com

Password chicago2019

Kim Nowy: OK

Half

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<sup>37</sup> Law enforcement believes that the true identify of "Kim Nowy" is the foreign national identified in this Affidavit as "Individual 23."

CIBOROWSKI: Ok

Kim Nowy: Any minute, another

CIBOROWSKI: Ok

Kim Nowy: Half

CIBOROWSKI: Ok

Kim Nowy: Someone is about to be here

CIBOROWSKI: Ok

Kim Nowy: Someone soon. 1 hour

CIBOROWSKI: Ok

Kim Nowy: Someone soon

CIBOROWSKI: Ok. Turn the light in the hallway please<sup>38</sup>

Kim Nowy: OK. 1 hour

CIBOROWSKI: Ok. And how was today

Kim Nowy: It was average. I had two for a half and two for an hour. I have one booked for 7:30 p.m.

CIBOROWSKI: Ok. There's still some time

Kim Nowy: It's calm

CIBOROWSKI: Exactly

Kim Nowy: Listen, maybe write on the announcements that I am Polish because every now and then someone asks if I'm Latina

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<sup>38</sup> As discussed elsewhere in this Affidavit, based on evidence discovered on Ciborowski's Phones, statements made by Norridge Girls escorts, and recorded communications between CIBOROWSKI and DANILUK, the organizers of the Norridge Girls operation used cameras to monitor the comings and goings of clients and escorts. This message suggests that CIBOROWSKI had access to a camera inside the location where "Kim Nowy" was working at the time.

CIBOROWSKI: Ok, I'll change it in the morning

Kim Nowy: Ok. Someone soon

CIBOROWSKI: Ok

Kim Nowy: 1 hour

CIBOROWSKI: Ok

v. On or about January 22, 2020, between approximately 9:46 p.m. and 9:49 p.m., Ciborowski Phone 2 exchanged the following text (iMessage) messages with "Kim Nowy":

CIBOROWSKI: Hey, how long are you going to stay

Kim Nowy: I have a return flight on February 17th and I was thinking of coming back in June

CIBOROWSKI: Ok. You will have to arrange that with Kasia

Kim Nowy: Ok

vi. On or about January 26, 2020, between approximately 7:54 a.m. and 8:20 a.m., Ciborowski Phone 2 exchanged the following text (iMessage)messages with "Kim Nowy":

Kim Nowy: Hey, what time are we going to western

CIBOROWSKI: I'm about to call Karol. They open around 11 today

Kim Nowy: Then maybe we'll talk in the evening because at 10-11 I want to go downtown

CIBOROWSKI: Ok, or maybe tomorrow at 9



vii. On or about January 9, 2020, between approximately 12:03 p.m. and 9:34 p.m., Ciborowski Phone 2 exchanged the following text (iMessage)messages with “Aska Nowy”:<sup>39</sup>

CIBOROWSKI: Are you affiliated with police or any type of law enforcement. The site is rubratings

Aska Nowy: Ok, thanks

CIBOROWSKI: And what is going on?

Aska Nowy: They are writing a lot to me

CIBOROWSKI: Super

Aska Nowy: 1 hour, 200

CIBOROWSKI: Ok

Aska Nowy: Left

CIBOROWSKI: Ok

Aska Nowy: 200 1 hour

CIBOROWSKI: Ok

Aska Nowy: Left

CIBOROWSKI: Ok

Aska Nowy: 200

CIBOROWSKI: ?

Aska Nowy: In terms of an hour

CIBOROWSKI: Lol. Ok

Aska Nowy: Thought abbreviation.

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<sup>39</sup> Law enforcement believes that the true identify of “Aska Nowy” as a foreign national identified in this Affidavit as “Individual 24.”

CIBOROWSKI: Haha

Aska Nowy: Left

CIBOROWSKI: Ok. When you are giving the address, give my address ok

Aska Nowy: Ok

CIBOROWSKI: Thanks

Aska Nowy: A million text messages asking for tomorrow or the weekend. So I think it will be good

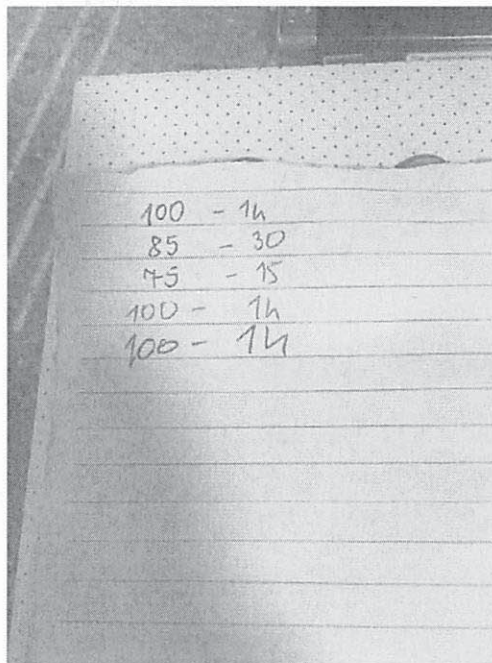
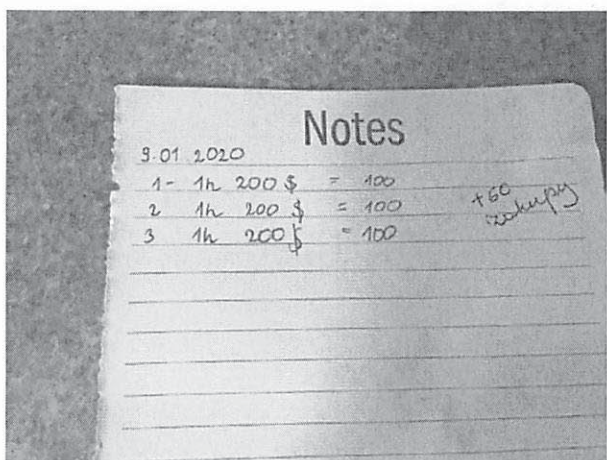
CIBOROWSKI: It will. With us it's always good

Aska Nowy: Today I don't have any more takers but tomorrow someone wants to at 9. Summary of today  $3 \text{ h} = 600 / 2 = 300$

CIBOROWSKI: It's ok. Tomorrow will be better

Aska Nowy: Exactly

viii. On or about January 10, 2020, at approximately 12:02 p.m. and 3:55 p.m., Ciborowski Phone 2 received the following pictures, sent via text (iMessage) message by "Aska Nowy":



ix. On or about January 13,2020, between approximately 10:16 p.m. and 10:25 p.m., Ciborowski Phone 2 exchanged the following text (iMessage) messages with "Aska Nowy":

Aska Nowy: Left. The tanning salon is open until 11 p.m. so I'm going to rush to make it

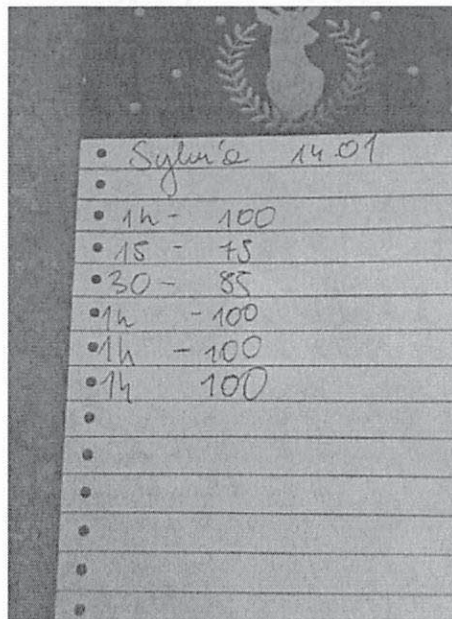
CIBOROWSKI: Don't take any more blacks

Aska Nowy: Ya, I thought to write that I don't take AA but after he came I told him to stay

CIBOROWSKI: It's ok

x. On or about January 14, 2020, at approximately 8:03 p.m., Ciborowski Phone 2 received the following picture, sent via text (iMessage) message by "Aska Nowy":





xi. On or about January 16, 2020, between approximately 1:57 p.m. and 2:12 p.m., Ciborowski Phone 2 exchanged the following text (iMessage) messages with "Aska Nowy":

CIBOROWSKI: How is it by you

Aska Nowy: I wrote to Karol. I forgot that it works already

CIBOROWSKI: Lol

b. Second, Ciborowski Phone 2 contained multiple images of passports of at least three suspected Norridge Girls escorts, including images with the suspected escorts posing while holding up their passports next to their faces. Law enforcement identified escort ads resembling each of the women depicted in this photos on Ciborowski Phone 2. Based on my training and experience, I believe that CIBOROWSKI maintained these photos in order to (among other reasons) track the true identities and appearances of the women employed by the operation.

c. Third, Ciborowski Phone 2 contained evidence that he used cameras installed at the Elk Grove Location (Subject Premises 1) to monitor the comings and goings of women and clients from the location. More specifically:

i. Ciborowski Phone 2 contained more than 400 surveillance photographs or videos from at least two Nest-brand home cameras.<sup>40</sup> As discussed above, based on interviews with women who worked for the Norridge Girls operation and recorded calls between CIBOROWSKI and DANILUK, law enforcement believes that the organizers of the operation used cameras to keep track of clients and maintain accountability over the escorts.

ii. Law enforcement also discovered several text (iMessage) exchanges between Ciborowski Phone 2 and an individual identified as “Sandra” in the phone. The conversations indicate that CIBOROWSKI was actively monitoring the camera or cameras installed at the location.

1. One exchange, which occurred on or about January 21, 2020, between approximately 11:03 a.m. and 10:20 p.m., contained the following communications:

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<sup>40</sup> Based on my training and experience and publicly available information, I know that such cameras can be quickly installed with a conventional power plug and a wireless “Wifi” internet source. Once installed, the camera’s user can create an account through which he can monitor footage from the camera through a cellular telephone (such as an iPhone), laptop computer, or other compatible device. The user can also record and archive footage, implement automated functions for the cameras (such as setting them to record only when the cameras detect motion), and allow other users to access the cameras from their own cellular phone or other compatible device.

CIBOROWSKI: When you give the address, write to Karol that you gave the address. We have cameras and we can see who is coming

Ok?

Sandra: Ok

CIBOROWSKI: Thank you

alexapolka2019@gmail.com Password chicago 2019

Get rid of grandpa because we want to come

Sandra: He left a long time ago

CIBOROWSKI: It's ok, we'll be there in the morning

Sandra: Good night

Buy rubbers for work

CIBOROWSKI: Ok, goodnight.

2. Another exchange, which occurred between on or about January 25, 2020, between approximately 1:30 p.m. and 10:23 p.m., contained the following communications:

CIBOROWSKI: Two cannot go out at the same time!!!!

Sandra: Work is done for the day

iii. Law enforcement believes that the cameras discussed above were installed at the Elk Grove Location (Subject Premises 1) because law enforcement observed postings on online prostitution forums indicating that an escort using the name "Sandra" was operating in Elk Grove at approximately the time of the text messages above between CIBOROWSKI Phone 2 and "Sandra."



d. Fourth, Ciborowski Phone 2 had access to at least ten separate email accounts which, collectively, contained hundreds of emails related to posting, maintaining, and paying for escort advertisements for dozens of women across several online marketing platforms, and for accessing a home-security camera used by CIBOROWSKI and others to monitor the prostitution activities at one or more locations used to commit the Subject Offenses.

i. For example, Ciborowski Phone 2 contained multiple erotic photos sent via WhatsApp by an individual, discussed above, identified in the phone as "Laura." Law enforcement compared the images sent by "Laura" with online escort advertisements and identified an ad on "rubratings.com" containing one of the photos. The ad listed a "Provider ID" number of 158651 and a "Latest Activity" date of February 13, 2020. Consistent with other Norridge Girls advertisements identified to date, the ad stated that "Laura" was available "IN CALL ONLY" and "NO AA [African-Americans] SORRY." Among the emails identified to date from "sarapolka2019@gmail.com" ("Subject Gmail Account 1"), one of the accounts accessible from Ciborowski Phone 2, is a message dated February 13, 2020, from "notifications@rubratings.com," stating, in part: "Your recent transaction is complete for ad #158651. Your ad has been successfully refreshed and any add-ons you selected have been applied. Review your purchase history here for more details: [weblink]." That same day, "marthachicago2019@gmail.com" ("Subject Gmail Account 2"), another account accessible from Ciborowski Phone 2, received a message from "no-

reply@coinbase.com” stating, in part: “You just sent 0.00116927 BTC (\$12.01 USD) . . . . to [specified Bitcoin address].”<sup>41</sup>

ii. In addition to this example and in summary, to date law enforcement has identified the following categories of prostitution-related communications in the following accounts:

1. Ciborowski Phone 2 contained at least approximately 58 emails for “sarapolka2019@gmail.com” (“Subject Gmail Account 1”). Preliminary analysis of “Subject Gmail Account 1” revealed multiple emails (in addition to the message from rubratings.com described above) pertaining to the posting and maintenance of online escort advertisements, including for the escort using the moniker “Laura,” on websites such as megapersonals.com, rubratings.com, and adultsearch.com.

2. Ciborowski Phone 2 contained at least approximately 1,112 emails for “marthachicago2019@gmail.com” (“Subject Gmail Account 2”). Preliminary analysis of “Subject Gmail Account 2” revealed multiple emails pertaining to the posting and maintenance of online escort advertisements,

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<sup>41</sup> According to the Coinbase website, see <https://www.coinbase.com/about> (last accessed April 28, 2020), “Coinbase is a digital currency wallet and platform where merchants and consumers can transact with new digital currencies like bitcoin, ethereum, and litecoin.” I discuss Bitcoin and other so-called cryptocurrencies later in this Affidavit. According to the RubRatings website, see [www.rubratings.com](http://www.rubratings.com), “Bitcoin is the only payment option.”

using terms such as “SYLVIA IS BACK”<sup>42</sup> on websites such as megapersonals.com and rubratings.com. In addition to the Coinbase email described above, Subject Gmail Account 2 contained hundreds of e-mail confirmations from Coinbase for cryptocurrency transactions, the majority of which are believed to have been payments for the posting and or maintenance of online escort advertisements. The account also contained numerous emails from “notifications@nest.com,” believed to be related to the home-surveillance camera discussed above. Several of the emails from Coinbase and Nest were directed to “Rafal Golaszewski,” which (as discussed above) is one of CIBOROWSKI’s known aliases.

3. Ciborowski Phone 2 contained at least approximately 406 emails for “alexapolka2019@gmail.com” (“Subject Gmail Account 3”). Preliminary analysis of “Subject Gmail Account 3” revealed multiple emails pertaining to the posting and maintenance of online escort advertisements, using terms such as “SEXY BLONDE STAR” and “POLISH BLONDE,” on websites such as megapersonals.com and rubratings.com.

4. Ciborowski Phone 2 contained at least approximately 179 emails for “amandapolka2019@gmail.com” (“Subject Gmail Account 4”). Preliminary analysis of “Subject Gmail Account 4” revealed multiple emails pertaining to the posting and maintenance of online escort advertisements,

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<sup>42</sup> Law enforcement believes that the true identity of the woman pictured in the “SYLVIA IS BACK” advertisement is the foreign national identified in this Affidavit as “Individual 24.”



using terms such as “Hot and Classy,” on websites such as megapersonals.com and rubratings.com.

5. Ciborowski Phone 2 contained at least approximately 1,072 emails for “aniapolska2019@gmail.com” (“Subject Gmail Account 5”). Preliminary analysis of “Subject Gmail Account 5” revealed multiple emails pertaining to the posting and maintenance of online escort advertisements, using terms such as “Polish Brunette,”<sup>43</sup> “Touch of Europe,” “Just Arrived,” and “NEW IN TOWN,”<sup>44</sup> on websites such as megapersonals.com and rubratings.com.

6. Ciborowski Phone 2 contained at least approximately 48 emails for “katepolka2019@gmail.com” (“Subject Gmail Account 6”). Preliminary analysis of “Subject Gmail Account 6” revealed multiple emails pertaining to the posting and maintenance of online escort advertisements, including for the escort using the moniker “Aneta,” on websites such as megapersonals.com, rubratings.com, eros.com, and yes backpage.de.

7. Ciborowski Phone 2 contained at least approximately 1,332 emails for “larapolka2019@gmail.com” (“Subject Gmail Account 7”). Preliminary analysis of “Subject Gmail Account 7” revealed multiple emails pertaining to the posting and maintenance of online escort advertisements,

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<sup>43</sup> Law enforcement believes that the true identity of the woman pictured in the “Polish Brunette” advertisement is the foreign national identified in this Affidavit as “Individual 23.”

<sup>44</sup> Law enforcement believes that the true identity of the woman pictured in the “NEW IN TOWN” advertisement is the foreign national identified in this Affidavit as “Individual 12.”

using terms such as “Polish Blond Star,” “LAURA IS BACK IN TOWN,”<sup>45</sup> “POLISH STAR LARA,”<sup>46</sup> and “YOUNG BEAUTY,” on websites such as megapersonals.com, rubratings.com, and yesbackpage.de.

8. Ciborowski Phone 2 contained at least approximately 109 emails for “nikipolka2019@gmail.com” (“Subject Gmail Account 8”). Preliminary analysis of “Subject Gmail Account 8” revealed multiple emails pertaining to the posting and maintenance of online escort advertisements, using terms such as “Ana Elite Companion” and “Niki Polish Girl,”<sup>47</sup> on websites such as megapersonals.com and rubratings.com.

9. Ciborowski Phone 2 contained at least approximately 122 emails for “paulinachic2019@gmail.com” (“Subject Gmail Account 9”). Preliminary analysis of “Subject Gmail Account 9” revealed multiple emails pertaining to the posting and maintenance of online escort advertisements, using terms such as “Bombshell Laura” and “Sweet with a Little Sunshine,” on websites such as megapersonals.com and rubratings.com.

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<sup>45</sup> Law enforcement believes that the true identity of the woman pictured in the “LAURA IS BACK IN TOWN” advertisement is the foreign national identified in this Affidavit as “Individual 25.”

<sup>46</sup> Law enforcement believes that the true identity of the woman pictured in the “POLISH STAR LARA” advertisement is the foreign national identified in this Affidavit as “Individual 5.”

<sup>47</sup> Law enforcement believes that the true identity of the woman pictured in the “Niki Polish Girl” advertisement is the foreign national identified in this Affidavit as “Individual 26.”



10. Ciborowski Phone 2 contained at least approximately 201 emails for “paulinachicago2019@gmail.com” (“Subject Gmail Account 10”). Preliminary analysis of “Subject Gmail Account 10” revealed multiple emails pertaining to the posting and maintenance of online escort advertisements, using terms such as “HOT POLISH GIRL”<sup>48</sup> on websites such as megapersonals.com, rubratings.com, slixa.com, and eros.com.

### **VIII. Evidence Relating to Subject Premises 1 and Subject Premises 2**

63. As discussed above, based on the investigation to date—including but not limited to a review of prostitution-related internet-forum postings, evidence obtained incident to the arrest of CIBOROWSKI in February 2020 for immigration offenses, and evidence obtained from Ciborowski’s Phones—law enforcement believes that, since at least approximately February 2020, the Norridge Girls organization has operated a prostitution location at 615 Perrie Drive, Unit 407, Elk Grove Village, Illinois (the Elk Grove Location, or Subject Premises 1) As discussed in this section, law enforcement believes that the Norridge Girls operation continues to operate out of the Elk Grove Location (Subject Premises 1), and has also moved at least one escort from this location to an apartment in Rosemont previously occupied by Dzielski (Subject Premises 2).

64. On or about April 20, 2020, at approximately 8:25 p.m., CIBOROWSKI, who was using the McHenry County Jail prisoner phone system, called DANILUK,

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<sup>48</sup> Law enforcement believes that the true identity of the woman pictured in the “HOT POLISH GIRL” advertisement is the foreign national identified in this Affidavit as “Individual 24.”



who was using Daniluk Phone 1. During the call, DANILUK told CIBOROWSKI, in effect that a neighbor at the location where “the Russian” was located had posted a note to the door complaining about excess foot traffic at the location. Based on postings observed on prostitution-related internet forums, law enforcement believes that the apartment discussed by CIBOROWSKI and DANILUK was the Elk Grove Location (Subject Premises 1), and that “the Russian” referred to one of the escorts working at that location. Law enforcement also identified advertisements indicating that a woman who used the moniker “Wiki” operated out of a location in Elk Grove Village, Illinois.

65. In light of the neighbor’s complaint, DANILUK stated, he asked the ginger (Dzielski) to switch apartments with “the Russian,” so she could continue working and earning money.<sup>49</sup> CIBOROWSKI and DANILUK discussed the apartment-switch plan on several additional calls over the next several days. For example, during a call on or about April 22, 2020, DANILUK stated that he had received an inquiry from “the lady from the association” who had “heard about things from a neighbor and was wondering what is going on there.” CIBOROWSKI

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<sup>49</sup> CIBOROWSKI and DANILUK apparently intended for a second escort to remain at Subject Premises 1 while “the Russian” moved to Dzielski’s former residence at Subject Premises 2. During the call on April 20, CIBOROWSKI asked DANILUK, in effect, if there was still another worker at the Elk Grove Location (Subject Premises 1). DANILUK responded, in effect, that another worker was scheduled to be at the Elk Grove Location (Subject Premises 1) until approximately April 27, and that she was “only” seeing about two clients a day because business was slow. Based on recently posted escort ads, and as of the date of this Affidavit, it appears that the escort working at Subject Premises 1 did not depart the country on April 27 and continues to work from Subject Premises 1.

responded, in effect, that it was good that “she” would be moving to the other place and that it would be quiet at the Elk Grove Location after that. DANILUK told CIBOROWSKI, in effect, that “the ginger” (Dzielski) was supposed to move that day but it wasn’t easy moving everything from one location to another and vice versa.

66. Based on information obtained through a public records clearinghouse and credit reporting bureaus, and physical surveillance conducted by law enforcement, law enforcement determined that Dzielski lived at 9514 Glenlake Avenue, Apt 226, Rosemont, Illinois (“Subject Premises 2”). On or about April 28, 2020, law enforcement observed Dzielski driving a gold-colored late-model Honda Odyssey minivan bearing IL dealer license plate number DL6421<sup>50</sup> in the parking lot outside Subject Premises 2. A woman who resembled the online escort photos for “Wiki” entered the van and smoked a cigarette. Dzielski then retrieved a television from the vehicle, and he and the woman entered the apartment building. Approximately twenty minutes later, Dzielski exited the building carrying what appeared to be a different television. After discarding the television in a nearby dumpster, Dzielski reentered the building. Approximately ten minutes later, Dzielski exited the building once more, this time carrying a black bag. He placed the bag in the minivan and drove away. (As discussed in greater detail below, Dzielski drove to the vicinity of DANILUK’s apartment (Subject Premises 3), where law enforcement observed DANILUK pass Dzielski a white bag with unknown contents in a parking lot outside Subject Premises 3.)

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<sup>50</sup> Law enforcement had previously observed this vehicle on or about April 23, 2020, inside a parking garage at the apartment building containing Subject Premises 1.

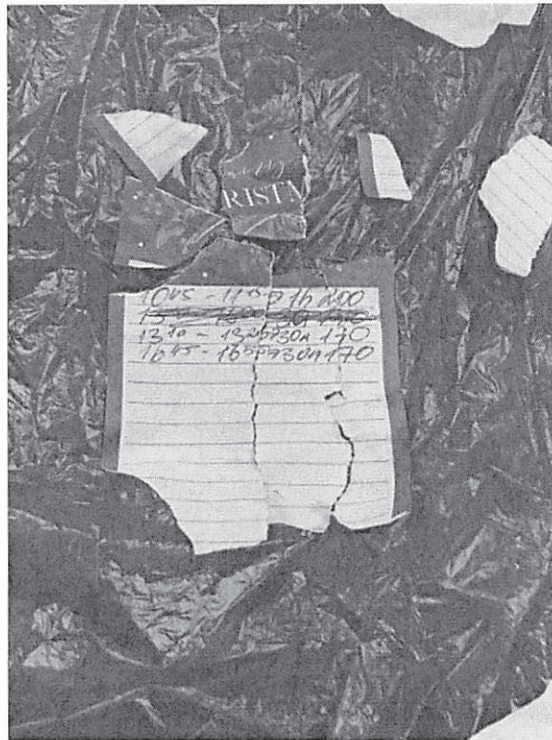


67. Later that day, at approximately 9:30 p.m., law enforcement observed Dzielski and Individual 14, Dzielski's suspected girlfriend and former Norridge Girls escort, at the mailboxes in the building lobby of Subject Premises 1.

68. As noted above, escort advertisements for "Wiki" previously indicated that she was working out of a location in Elk Grove Village. On or about April 25, 2020, escort advertisements for Wiki indicated that she was working out of a location in Des Plaines, Illinois, which is adjacent to Rosemont, Illinois, and close to Subject Premises 2.

69. On or about April 29, 2020, at approximately 12:30 p.m., agents conducting surveillance at Subject Premises 2 observed a female resembling "Wiki" exit the building and dispose of a black trash bag in the parking lot dumpster. Agents maintained visual surveillance of the trash bag and recovered it a short time later. The trash bag contained, among other things, at least five used condoms, numerous amounts of wet wipes, condom wrappers, toilet paper waste, and a ledger, pictured below, apparently listing durations and costs of three client sessions consistent with the typical rates charged by Norridge Girls escorts (discussed elsewhere in this affidavit):





70. In addition to the evidence above, postal records indicate that the woman—that is, “Wiki”—currently residing at Subject Premises 2 is the same Norridge Girls escort who previously resided at Subject Premises 1. For example, according to postal records, parcels were delivered to “Claudia Caxzi” at Subject Premises 1 on or about April 1 and April 8, 2020. No parcels have been delivered to “Claudia Caxzi” at Subject Premises 1 since the apartment switch discussed above. According to postal records, however, “Claudia Caxzi” is the intended recipient of a parcel currently in transit to Subject Premises 2.

71. On or about May 3, 2020, law enforcement learned that “Wiki” had traveled to O’Hare Airport in Chicago. Law enforcement subsequently identified the true identify of “Wiki” as a foreign national referred to in this affidavit as “Individual 28.” Based information obtained from American Airlines, law

enforcement believes that, on or about May 2, 2020, Individual 28 traveled from Chicago to Miami but has not yet departed the United States. Based on ongoing physical surveillance as of today, May 4, 2020, law enforcement believes that one or more escorts continue to work at Subject Premises 2.

#### **IX. Evidence Relating to Subject Premises 3**

72. As discussed in greater detail elsewhere in this Affidavit, based on the investigation to date, law enforcement believes that, while DANILUK generally resided with his wife at the house in Algonquin, Illinois (discussed above), he has since at least January 2020 also maintained a residence with his girlfriend, Individual 11, at the Moonlake Village Condominiums, 1475 Rebecca Drive, Apartment 409, Hoffman Estates, Illinois ("Subject Premises 3"). Since at least approximately April 13, 2020, law enforcement believes that DANILUK has used Subject Premises 3 to store Daniluk Phone 1 and proceeds of the conspiracy's prostitution business.

73. On or about April 2, 2020, at approximately 8:35 a.m., law enforcement observed DANILUK depart the house in Algonquin driving a late-model white Jeep Grand Cherokee bearing IL tags BE52652. As noted above, law enforcement previously determined that this vehicle was registered to DANILUK's mother-in-law at the same address in Algonquin, Illinois.

74. Law enforcement followed DANILUK as he stopped at a convenience store in Elgin, Illinois, and then merged onto Interstate 90. Shortly after entering the highway, DANILUK was observed making frequent lane changes, slowing down to



50mph (in a 70mph zone), then quickly speeding back up. He then traveled quickly from the left-most lane across three lanes of traffic to exit the highway at Barrington Road. He made numerous other turns, at one point driving through a parking lot to change directions and retrace his routes. Law enforcement believed that DANILUK was driving in this erratic matter in order to detect and evade law enforcement surveillance. In light of DANILUK's actions, and after following him for approximately an hour, law enforcement broke off surveillance.

75. Later that day, at approximately 11:32 a.m., CIBOROWSKI, who was using the McHenry County Jail prisoner phone system, called DANILUK, who was using Daniluk Phone 1. During a portion of that phone call, DANILUK told CIBOROWSKI that he had been followed that morning by several vehicles. CIBOROWSKI asked DANILUK whether "it [the surveillance]" had started "at the house or Hoffman," and DANILUK responded, "the house." CIBOROWSKI and DANILUK then discussed how the ginger (Dzielski) was going to check on "the other location" and DANILUK's house to confirm there was no "heat" at "our territories."

76. On or about April 3, 2020, at approximately 7:24 p.m., CIBOROWSKI, using the prisoner phone system, called DANILUK, who was using Daniluk Phone 1. The call lasted approximately 13 minutes, and included the following exchange, beginning approximately 2:55 seconds into the call:

DANILUK: I'm waiting, you know.

CIBOROWSKI: Uhuh, uhuh, oh because [first name of Individual 11, DANILUK's girlfriend] is there?



DANILUK: No. she's in the other room.

CIBOROWSKI: Oh and where did you tell [first name of Individual 15, DANILUK's wife] you are at?

DANILUK: I fucking told her I'm hiding out.

CIBOROWSKI: [laughing] Of course.

DANILUK: I mean, she is used to this.

CIBOROWSKI: [laughing] I just was wondering if she was asking, who? What? Where?

DANILUK: No, I fucking hid myself and that's the end.

77. After learning that DANILUK was likely staying at an unidentified location in Hoffman Estates, law enforcement conducted queries of license plate reader databases for vehicles connected with DANILUK, including, as discussed above, the 2016 Jeep Grand Cherokee bearing IL tag BE52652. According to license plate reader records, this Jeep had been captured on January 7, 2020, March 3, 2020, March 7, 2020, April 3, 2020, and April 5, 2020, at Moon Lake Village, a residential condominium complex located at 1885 Jennifer Lane in Hoffman Estates, Illinois.

78. On April 10, 2020, Chief Judge Rebecca R. Pallmeyer issued a warrant authorizing law enforcement to obtain historical and prospective cell-site location data for Daniluk Phone 1. On approximately April 13, 2020, law enforcement began receiving geolocation coordinates, commonly referred to as "pings," pursuant to this warrant. The pings indicated that, since that date and except for a handful of instances where the device has been moved elsewhere (primarily to DANILUK's residence in Algonquin) or powered off, Daniluk Phone 1 has been located in the vicinity of the Moon Lake Village condominiums.

79. Over the next several weeks, law enforcement determined that, of the multiple buildings within the Moon Lake Village condominium complex, DANILUK was likely residing in Unit 409 of the building at 1475 Rebecca Drive, in Hoffman Estates ("Subject Premises 3"). More specifically:

a. On or about April 13, 2020, law enforcement observed the white Jeep Grand Cherokee bearing IL tag BE52652 in the west parking lot of the 1475 Rebecca Drive building.

b. On or about April 22, 2020, law enforcement observed Individual 11, DANILUK's girlfriend, exit the 1475 Rebecca Drive building and go for a run, returning to the same building approximately one hour later.

c. On or about April 24, 2020, law enforcement again observed Individual 11 exit the 1475 Rebecca Drive building and go for a run, returning to the same building approximately one hour later.

d. Later that same day, law enforcement observed DANILUK approach the 1475 Rebecca Drive building on foot—presumably after having been dropped off elsewhere in the complex in an attempt to avoid detection by law enforcement—and enter the building through the main entrance. As he walked, DANILUK could be seen talking on a cellular phone. Based on law enforcement's later review of toll records and jail-call records, at this time DANILUK Phone 1 was engaged in a phone call with CIBOROWSKI at the McHenry County Jail.

80. According to the Moon Lake Village directory, Unit 409 in the 1475 Rebecca Drive building was attributed to the last name of Individual 27. This name



attracted law enforcement's attention because toll records for Daniluk Phone 1 indicate that, in March and April 2020, Daniluk Phone 1 had multiple communications with a telephone number subscribed to Individual 27. In addition, during multiple recorded jail calls in March and April 2020, CIBOROWSKI and DANILUK referred to a man using phonetic nicknames for Individual 27's first name.

81. On or about April 28, 2020, ping data from DANILUK Phone 1 indicated that the device had been moved from the area of the Moon Lake Village condominiums to the area of DANILUK's residence in Algonquin, Illinois, where the phone remained until it was turned off that night. The next morning, law enforcement observed a white Audi A8—consistent with the same model vehicle previously linked to DANILUK (discussed above)—driving near the Moon Lake Village condominiums. Shortly after seeing the vehicle, law enforcement conducting surveillance inside the 1475 Rebecca Drive building observed DANILUK open and enter Unit 409 in that building ("Subject Premises 3"). Minutes after this observation, the pings of DANILUK's telephone indicated the handset was powered back on located in the vicinity of Subject Premises 3.

82. Based on the investigation to date, including jail calls and physical surveillance, law enforcement believes that DANILUK is using Subject Premises 3 to store evidence, instrumentalities, and fruits of the Subject Offenses, including cash and Daniluk Phone 1. This conclusion is based on, among other things, statements by Individual 12 (CIBOROWSKI's girlfriend) that DANILUK and Individual 11 store



“money” at Subject Premises 3, and an instance in which DANILUK provided Dzielski with a bag containing unknown items from Subject Premises 3.

83. First, CIBOROWSKI and Individual 12 have repeatedly discussed their knowledge that DANILUK and Individual 11 have stored money at the residence they share. For example:

a. On or about April 8, 2020, at approximately 7:00 p.m., CIBOROWSKI, using the McHenry County Jail prisoner phone system, called Individual 12, who was using a phone number ending in 6578 (“Individual 12 Phone 1”).<sup>51</sup> The call lasted approximately 22 minutes, and included the following exchange, beginning approximately 19:10 seconds into the call:

Individual 12: She [believed to be Individual 11, DANILUK’s girlfriend] barely told me the truth today.

CIBOROWSKI: That what?

Individual 12: I asked her, what are you living off of there now? And she said that there is money at the house but that she doesn’t take or use any of it.

CIBOROWSKI: That what, that what is there at the house?

Individual 12: That there is money at the house but she only sees it.

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<sup>51</sup> I believe Individual 12 is the user of Individual 12 Phone 1 in the communications summarized in this Affidavit based on, among other things, the following: (1) consistent with information discussed elsewhere in this Affidavit, CIBOROWSKI has called Individual 12 by her first name, asked about Individual 12’s daughter, referred to the romantic relationship between himself and Individual 12, and discussed money he has sent to Individual 12; (2) on multiple occasions immediately before or after completing a phone call with Individual 12 Phone 1, CIBOROWSKI has spoken on the phone with DANILUK and referenced his completed or intended calls with Individual 12.

CIBOROWSKI: But that's money that is being put away, she can't have access to it anyway, it should just lay there.

b. On or about April 13, 2020, at approximately 12:30 p.m., CIBOROWSKI, using the prisoner phone system, called Individual 12, who was using Individual 12 Phone 1. The call lasted approximately 13 minutes, and included the following exchange, beginning approximately 7:22 seconds into the call:

CIBOROWSKI: I lost the number to the lawyer and I had to call [Individual 22] because I didn't want to ask him [believed to be DANILUK] for it. I'll wait until Wednesday, and Wednesday I'll call him and say Friday Heights, every Friday for Heights [believed to be a prostitution location in Harwood Heights] he needs to fucking give up returns if fucking. [inaudible]

Individual 12: And who has the money for the car?

CIBOROWSKI: What?

Individual 12: Who has the money for the car?

CIBOROWSKI: [Individual 22] has it, what did you think.

Individual 12: Oh, I thought he [DANILUK] had it.

CIBOROWSKI: No, no no no.

Individual 12: Because he would fuck you over and not return that.

CIBOROWSKI: No, I would beat his fucking ass for that.

Individual 12: I just mean, when it comes to money, I don't trust anyone.

CIBOROWSKI: Me too, don't worry, I don't either. But listen because I was thinking, I don't know what will happen.

Individual 12: I trust [Individual 22] if we're talking about money.

CIBOROWSKI: You can trust me to I've never fucked you over.

Individual 12: One more time?

CIBOROWSKI: I also had your money and never fucked you over.

Individual 12: Yeah, I'm just saying [Individual 22] also picked up my money, and she never fucked me over, so I trust her.

CIBOROWSKI: Yeah, I wanted to say something.

Individual 12: But not that deadbeat.

CIBOROWSKI: I will call him, because she has the money from the car, but I'm scared that they'll want to put a bond on me you know because my bond hearing is coming up.

Individual 12: Of course, of course, I know what you're saying.

CIBOROWSKI: Because they might want to set a bond for like \$8,000 USD, or \$5,000 USD so if I spend that fucking money I won't have enough for the fucking bond. Because [Individual 22] isn't working, that fucker isn't working, this fuck [believed to be DANILUK] won't help me because of how this situation is now.

Individual 12: It's normal that he won't help you.

CIBOROWSKI: We will fucking figure it out, somehow so you don't have to go to fucking work. Because he has to split with me, there was fucking \$6,000 USD taken in, and plus three times \$1,700 USD. There is still a shit load of money laying there.

Individual 12: Mhm, mhm.



CIBOROWSKI: [inaudible; crosstalk]

Individual 12: He won't split with you

CIBOROWSKI: How can't he, if he doesn't, I'll get him locked up, I'll get him locked up so fast out of spite, I'll lock him up fast.

Individual 12: Mhm.

CIBOROWSKI: And that's the end, And no one will have anything.

Individual 12: And that's exactly it.

CIBOROWSKI: Because it can't be that one fucking person has it and the other fucking person doesn't. And it's all thanks to fucking me.

Individual 12: Yeah, exactly, you weren't begging for half of anything, he came and found you.

CIBOROWSKI: [inaudible; crosstalk]

Without me he wouldn't have any progress because he didn't fucking have anyone.

Individual 12: Exactly

CIBOROWSKI: And that ginger [believed to be Dzielski], that fucking ginger is you know, part-time because that ginger just keeps hanging around, he did with the old partner and now here. He's just a psycho, a fucking drug addict.

Individual 12: Yeah, I understand.

CIBOROWSKI: Yeah, yeah, yeah, he's this kind of you know . . .

Individual 12: [inaudible; crosstalk]

CIBOROWSKI: Of course, he likes the kind of people that won't oppose him, everything will just be as he says.

Individual 12: Of course.

CIBOROWSKI: Yeah. Let him do whatever he wants.

84. Second, law enforcement has observed DANILUK meet with Dzielski outside Subject Premises 3, where DANILUK provided Dzielski with a bag with unknown contents. On or about April 28, 2020, law enforcement observed Dzielski depart his resident in Rosemont (Subject Premises 2) carrying a large black bag. Dzielski placed the bag in the Honda Odyssey minivan discussed above. Approximately 30 minutes later, law enforcement observed Dzielski arrive in the minivan in the area of Subject Premises 3. Immediately prior to his arrival, law enforcement observed DANILUK exit Subject Premises 3 carrying a medium-sized white bag. DANILUK walked through a parking lot at the apartment complex and entered the minivan. A short time later, Dzielski drove to another location in the parking lot, where DANILUK exited the minivan without the white bag. DANILUK, apparently concerned that he was being watched, then walked the perimeter of the parking lot before reentering the 1475 Rebecca Drive building.

**X. Background on Prostitution and Sex Trafficking Organizations.**

85. Based on my training and experience and that of other officers involved in this investigation, I know that illicit prostitution businesses generate a high volume of currency, often in small denominations. In this case, based on a conservative estimate that the Norridge Girls operation employed four women at a time and that each woman earned \$5,000 in fees each week, the Norridge Girls



operation could have generated approximately \$40,000 a month in net profits for the organization's managers.<sup>52</sup>

86. The volume and nature of cash created by an illicit prostitution business creates a problem for the managers of the operation because the bulk and weight of the currency makes it very difficult to transport and conceal. These problems are compounded when the participants in criminal activity are foreign nationals without legal status in the United States, and thus may seek to transport funds abroad. As a result, those operating illicit prostitution organizations often seek to convert cash to make it more concealable or transportable, including through the legitimate banking system, by transferring the funds overseas, or through the use of virtual currencies or cryptocurrencies such as Bitcoin.<sup>53</sup> They may also seek to convert cash into

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<sup>52</sup> This estimate is based on the information discussed above, including reports that the Norridge Girls organization generally operated at least two locations at a time, with each location housing two or more escorts. The escorts generally worked seven days a week and saw up to ten clients a day, with base fees generally set at \$170 per half hour and \$200 per hour. The women were required to turn over half of their fees to the managers of the organization. As discussed above, Individual 8 reported that she earned \$38,000 over six weeks—or approximately \$6,300 a week—and that she alone gave approximately \$18,000 to the managers of the operation over this period. In addition, when Individual 4 was interviewed at the airport on or about September 30, 2019, she had in her possession approximately \$6,815 in cash, primarily in small denominations.

<sup>53</sup> Based on my experience with financial and cyber investigations, I know that virtual currencies or cryptocurrencies, such as Bitcoin, are internet-based currencies generally not issued by any government, bank, or company, but rather generated and controlled through computer software operating on a decentralized, “peer-to-peer” network. Typically, conventional currency is used in the first instance to acquire virtual currency over the internet or at a virtual currency ATM. Individuals conducting business using virtual currencies must use a computer or other electronic device, such as a smartphone, to access their electronic accounts (or wallets) which



physical assets by purchasing luxury items, such as vehicles. Indeed, in this case multiple Norridge Girls escorts reported that SURALA and DANILUK regularly drove them—in expensive vehicles such as Audis, BMWs, and Jeeps—to wire money back home. In addition, during the arrest of CIBOROWSKI, law enforcement discovered multiple wire transfer receipts and invoices showing that CIBOROWSKI had used cash to purchase thousands of dollars in airfare. And, during the jail calls summarized above, CIBOROWSKI and DANILUK discussed their use of Bitcoin, and an iCloud account to store certain numbers, which may refer to shared passwords for cryptocurrency wallets or services.

#### **XI. Request to Seal**

87. First, as noted above, the investigation into the criminal activities of the subjects of the investigation is ongoing and agents are working to identify the roles of various known and unknown co-conspirators. More specifically, and as summarized above, based on jail calls between CIBOROWSKI and DANILUK, law enforcement believes that DANILUK and other subjects are continuing to operate the Norridge Girls prostitution organization and are unaware of the existence of the government's investigation, which is in its early stages. To render the investigation overt at this time, as would happen if the government were required to give notice of

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have “addresses” analogous to bank account numbers. These accounts may be stored on the user's device(s) or with third-party providers in the United States or abroad.

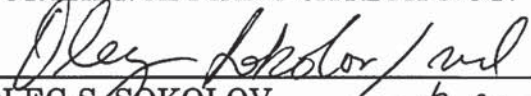
Generally, virtual currency transactions are conducted without the use of identifying information about the participants in the transaction. In addition, virtual currency transactions often occur on the so-called “dark web,” and operate outside of traditional bank tracking systems. These features make virtual currency products an attractive option to those who seek to launder the proceeds of criminal activities.

the search immediately, would likely cause DANILUK and other subjects to discontinue, or take new steps to conceal, their criminal activity and/or destroy evidence. Revealing the investigation would create a risk of witness intimidation (as noted above, multiple Norridge Girls escorts have expressed or exhibited fear of those running the operation) and flight from prosecution (virtually all participants in the operation are foreign nationals).

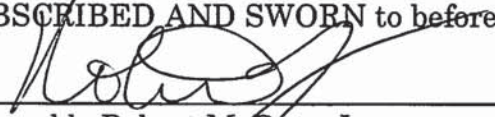
## **XII. Conclusion**

88. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that, from in and around 2016 to in or around the present, in the Northern District of Illinois, Eastern Division, and elsewhere, MARCIN CIBOROWSKI and MARIUSZ DANILUK violated Title 18, United States Code, Section 371, in that they conspired to import, or attempt to import into the United States; to hold or attempt to hold; and to keep, maintain, control, support, employ, or harbor in any house or other place, aliens for the purpose of prostitution or for any other immoral purpose, in violation of Title 8, United States Code, Section 1328.

FURTHER AFFIANT SAYETH NOT.

  
OLEG S. SOKOLOV *with permission*  
Special Agent, Internal Revenue Service *telephonically*

SUBSCRIBED AND SWORN to before me on May 4, 2020.

  
Honorable Robert M. Dow, Jr.  
United States District Judge